

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kcdl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0942

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nikita Hulbert

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-a8vt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0943

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Browman

Organization: Moms Rising

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-prep Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0944

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Bush

General Comment

I think it is absurd, bordering on insane, to eliminate State Department Blue Lantern program, to remove licensing requirements for brokers, and to remove States block on 3D printing of firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-986q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0945

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Mutascio

General Comment

This BENEFITS NO ONE except for gun manufacturers. And potentially HARMS many people. This is a very bad ruling.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-sbcm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0946

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Aydelott

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-340o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0947

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Bendio

General Comment

I am opposed to the rule change for international traffic in arms. There is no reason to change this rule, other than to increase sales of firearms. Please don't change the rule

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zv6g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0948

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Crupi

General Comment

I oppose this proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

In fact, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additionally, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. All these represent threats to U.S. national security.

I urge you to oppose this proposed rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-brkr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0949

Comment on DOS-2017-0046-0001

Submitter Information

Name: Trisha tenBroeke

General Comment

As a citizen concerned with our nation's security, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I have deep concerns about the effect this rule change would cause. Specifically, I have many concerns, including that: it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Again, I strongly oppose this rule change. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-k2od Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0950

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose changing the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would make it easier for guns to end up in the hands of those outside of the law like organized crime and terrorist organizations and enemy regimes. It would further fuel violence that destabilizes countries and causes mass migration.

Selling guns outside of the US is NOT business as usual and must be monitored by expertise of the State Dept, not the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kbmu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0951

Comment on DOS-2017-0046-0001

Submitter Information

Name: Billy Angus

General Comment

Get rid of the NRA!!

They're nothing but a terrorist organization, plain and simple!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-3r6y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0952

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Mattison

General Comment

I oppose this rule change that would switch regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous, and are used in to kill people around the world daily through organized crime, political violence, and terrorism. They should be subject to more controls, not fewer! Their trade and commerce should remain under the auspices of national security, not commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-4c1x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0953

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen Clarke

General Comment

I oppose this rule change. Enough is enough! The world does not need more guns!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-f8as Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0954

Comment on DOS-2017-0046-0001

Submitter Information

Name: Geri Collecchia

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-uu26 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0955

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Kwiatkowski

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it would jepotdize our natuonal security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-b238 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0956

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roger Wess

General Comment

The Department of State needs to control the sale of arms out of this country, not the Department of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-rw4w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0957

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erica Stanojevic

General Comment

How about we don't loosen restrictions on firearms.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-stz0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0958

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

In regard to human life and the safety of our country we need to keep the sale of all assault weapons and all firearms under the U.S. State Department and not allow it to be transferred to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-b8uy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0959

Comment on DOS-2017-0046-0001

Submitter Information

Name: Henry Lewis

General Comment

As an American teacher and someone who cares deeply about ending random violence and human rights abuses around the world, I firmly OPPOSE the rule change that would move the handling of export licenses for semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Personally, I don't trust American weapons manufacturers to be ethical when it comes to such foreign sales. In addition, the Commerce Department isn't structure to handle proper oversight of such sales.

Making it easier for weapons manufacturers to sell their wares without the oversight of the US Congress is insanity and flies in the face of everything the Trump administration says about trying to keep the Homeland safe from foreign terror and gang threats. Investigations have shown that many of the weapons used in drug and terror related crimes in Latin America (where I'm currently living and teaching) already originate in the USA. Taking away Congress's and the US State Department's oversight of large sales of semi-automatic weapons will only increase the violence in countries where human rights abuses are now common place. This, in turn, will cause more refugees to flee violence-plagued countries and attempt to cross into the USA illegally.

Isn't anyone in Washington, D. C. these days able to use critical thinking skills and connect the dots. The violence always makes it's way back to (and inside) America's borders.

I urge you to reject this rule change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-se4e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0960

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

This seems like a dangerous threat to our national security. I am against changes to this regulation.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-f0am Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0961

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dorothy Stegman

General Comment

I oppose this rule change which would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-s6bp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0962

Comment on DOS-2017-0046-0001

Submitter Information

Name: william gorenfeld

General Comment

More guns world wide = more violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9zy6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0963

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Armstrong-Magwood

General Comment

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-jwh2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0964

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy R Bogen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-3fmn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0965

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Funaroff

General Comment

Urgent. Do not switch firearms from control by state department to control by commerce dept.

This will promote more violence, destabilizing more governments and forcing more migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vq46 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0966

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca Chase-Chen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-dbqy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0967

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nicholas S Costa

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-piut Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0968

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristy Johnson

General Comment

This is absolutely absurd. Let's let the firearms manufacturers export guns so that they could possibly be used against our own citizens and soldiers. Tell the NRA NO, not only NO but HELL NO!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-lzf6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0969

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl Farmer MD

General Comment

Friends, I write in OPPOSITION to a rules change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would facilitate vastly increased sales of arms internationally, with serious implications for our national security. Such a policy could lead to an unfortunate future situation where our own combat troops face troublemakers armed with American made weaponry. This would be an unacceptable outcome! Please maintain the status quo on this issue, as current regulations have been effective for decades.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6cb5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0970

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robin Walden

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! It is unthinkable that the US would be considering promoting the sale of assault weapons world-wide.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-cb82 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0971

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Faigle

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The following reasons highlight why the change should not occur:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9ftf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0972

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Koster

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yudu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0973

Comment on DOS-2017-0046-0001

Submitter Information

Name: Olga Abella

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-2swv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0974

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Hubbard-Reeves

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

For multiple reasons, this rule change is not in the interests of the American people and I am in opposition to the change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-mwu5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0975

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Carroll

General Comment

I oppose the transfer of authority over the sales of guns from the State Department to the Commerce Department. Guns involve many factors that put them out of the realm of simple commerce.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942r-i7n9
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0976

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Howard

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

At present, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Weapons sales even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles in obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program (in place since 1940), which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting

made it possible for anyone with access to a 3D printer, anywhere in the world, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The motto is Make America Great Again our new motto should be KEEP AMERICA SAFE.

Dont allow this transfer occur.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942r-77q2
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0977

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jonathan Weinstock

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department, as it would:

- eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
 - remove licensing requirements for brokers, increasing the risk of trafficking.
 - remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.
- All of this would create a more dangerous society and world.

Thanks very much,
Jonathan

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yf0w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0978

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Kivel

Organization: SURJ--Showing Up for Racial Justice

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-en7k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0979

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Reynolds

General Comment

I oppose the rules change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rules change benefits the NRA, not American National Security! I oppose it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yk7e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0980

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike Andrewjeski

Organization: self

General Comment

No No No No!

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-n8n6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0981

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-14rt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0982

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Haines

General Comment

Please maintain control of Arms and weapons sales through the State Dept. Weapon sales need to be monitored and kept under tight control. Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-htrn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0983

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Truax

General Comment

I oppose the rule change that would switch the regulation of firearm exports from the US State Department to the US Commerce Department. Doing this could encourage the sale of large caches of weapons to foreign governments and organizations further endangering the US citizens.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-twuy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0984

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lari Tiller Howell

General Comment

I understand that the NRA is pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I fear that this would be the undoing of civilizing as we know it. At this point in history, with record unrest, human migration and displacement, adding more arms is disaster to the common man. Governments cannot win, peace cannot win, humanity cannot win. Changing the overseeing cabinet depart from the State to the Commerce department can only be for the purpose of selling death.

All it will do is control population growth. ZPG

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-w5q1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0985

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Varnum

General Comment

Jurisdiction over U.S. gun exports should be kept within the U.S. Department of State, and NOT transferred to the Department of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kz9a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0986

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-izeh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0987

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dori Goldman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-tbjt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0988

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Price

General Comment

No way!! This is the last thing we need. Please, no more.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-q01g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0989

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christopher Ivancevic

General Comment

This is an ABSOLUTE HORRIBLE IDEA! Just insane. This idea that one bullet for one pull of the trigger is somehow not worthy of maximum oversight is just naive at the least, and a complete disregard for human life at the worst. The state department must continue to safeguard our nation and oversee all firearm sales. This attempt to switch it to the Commerce Department is nothing more than a reckless money grab at the risk of human lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-7mf4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0990

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Anonymous

General Comment

I strongly oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-iqu3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0991

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donald Rumph

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I also believe that the United states has showered more than enough grief on citizens of the world through the excess gifting and sale of military weapons, including firearms but not forgetting shoulder fired rockets, Abrams tanks, F-35 fighters, and the list goes on. WE need to get in the peace business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-4luz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0992

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Wood

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-aohj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0993

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Hepfer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. it would allow more arms to enter the U.S., which would cause more shootings due to the availability.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-c4i7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0994

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Woodall

Organization: Lady Freethinker

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vctv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0995

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela LaRue

General Comment

Our national security comes first. Please keep control of arms sales abroad under control of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-2kdm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0996

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vaughan Greene

General Comment

Don't make it easier to export firearms. They usually end up with the wrong people anyway.
ENOUGH with guns everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-y1os Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0997

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hildy Feen

General Comment

I strongly oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Below are more reasons why the proposed rule change should not be approved:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

It would impact our national security by facilitating firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fueling violence that destabilizes countries and causes mass migration.

The world needs less firearms, not more.

Humanity needs less killing, not more.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-hdv5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0998

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Dishman

General Comment

Dear Sir:

I strongly oppose the proposal to switch the regulation of firearms from the U.S. State Department to the U.S. Department of Commerce. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place: It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would also remove licensing requirements for brokers, increasing the risk of trafficking. Additionally it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In summary, firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kvrj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-0999

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The US State Department is better equipped to keep in mind the security of the USA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-u8z3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1000

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rose Aranita

General Comment

The proposed changes to regulating international weapons sales opens the door to increased violence in other countries where human rights are at risk, strengthening of local gangs having access to more dangerous weapons, endangers fragile democracies threatened by tyrannical groups, and increases dangers to civil peace and families. For these reasons, I oppose the shifting of weapons deals to the Commerce Department. The globe and local citizens would be in danger of losing harmonious governance and peace in our families across the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9coz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1001

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allan Campbell

General Comment

I oppose this rule because it would allow more firearms. Because the regulations should not be changed to the Commerce department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-tm3v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1002

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Thompsson

General Comment

Shifting management of international trade in arms from the state department to commerce is NOT a good idea at all. The commerce platform will shift the focus from common sense safety to selling as many guns as possible. Do not do it. RSTHOMPSON MD

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-4rbr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1003

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Craft

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-tj0x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1004

Comment on DOS-2017-0046-0001

Submitter Information

Name: C. Warren Pope

General Comment

This relaxation in export rules for firearms is ridiculous and must be defeated. More guns means more death and more murders. Don't we have enough trouble in the US?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z14v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1005

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lester Stano

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z8t2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1006

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-5074 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1007

Comment on DOS-2017-0046-0001

Submitter Information

Name: PJ Lents

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-9a44 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1008

Comment on DOS-2017-0046-0001

Submitter Information

Name: Clara Salloom

General Comment

I oppose this rule change that would switch the regulation of firearms export from the State Department to the Commerce Department. This change would have serious implications for our national security. Firearms export regulations should continue to be the responsibility of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kjla Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1009

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christina Duck

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It's an absolute outrage that this is even happening. We will just be arming more terrorists with weapons. Don't let this happen!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z8lz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1010

Comment on DOS-2017-0046-0001

Submitter Information

Name: Franco Ferrer-San Miguel

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-fa83 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1011

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Sherman

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

- * It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- * It would remove licensing requirements for brokers, increasing the risk of trafficking.
- * It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-oo7t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1012

Comment on DOS-2017-0046-0001

Submitter Information

Name: Arthur Burzykowski

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ifm2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1013

Comment on DOS-2017-0046-0001

Submitter Information

Name: L. Adams

General Comment

I am against changing the regulatory oversight for arms sales to the commerce department. We do not need to be shipping weapons overseas to people like Duterte & Erdogan.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-e9bv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1014

Comment on DOS-2017-0046-0001

Submitter Information

Name: Terri Coppersmith

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please do not change the rules that help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-hav3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1015

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Zarate

General Comment

I oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-n0zn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1016

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-439q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1017

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nanette griesi

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-yp3l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1018

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jody Benson

General Comment

As a gun owner, former hunter, and former ARCAO (Korea: Camp Henry, Camp Humphries, Camp Casey 71/72 when these bases were primitive), I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not want weapons in the hands of terrorists and criminals in other countries that can be used, not only against their own people, but against Americans abroad.

Ive travelled the world and been in many conflict zones, including Afghanistan. The lawlessness of these areas is exacerbated by the fact that everybody owns a weapon. Small arms and light weapons are the preferred weapon of these small-time bullies, drug dealers, and cartels, as well as big-time terrorists like ISIS, al-Qaeda, al-Shabaab, Boko Haram.

Making light weapons (the definition includes: revolvers and self-loading pistols, rifles and carbines, assault rifles, sub-machine guns and light machine guns) available as a commodity anybody can order without any restrictions over the internet, makes it easy for small arms dealers to buy and resell these weapons, the favorites of terrorists, criminals, and drug dealers. We dont want American criminals to have these weapons. Lets not loose them on innocent civilians around the world. Say no to any loosening of any restrictions of exporting weapons. Dont be tone deaf to American values. Americans dont want more foreign threats, any more than we want more communities disrupted by gun violence. Make it harder for these terrorists to get guns, not easier. Keep cheap guns out of the hands of these bullies. Keep American government workers, international corporate workers, and tourists safe from criminals. People over profit.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-181p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1019

Comment on DOS-2017-0046-0001

Submitter Information

Name: susan dickerson

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

WE NEED TO BAN ALL SEMI, AUTOMATIC WEAPONS, BUMP STOCKS AND ASSAULT RIFLES/GUNS AND BUY BACK ALL OF THESE WEAPONS OF WAR.

Our country is being destroyed by guns. For the lives of the people, please do not pass this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-mmpd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1020

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Saul

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-sv65 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1021

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Roberts

General Comment

Recently proposed, suggestion is a tragedy to humankind- expanding USAs reputation as merchant of death to civilians. Bad enough America is already known for it in military weapons.

Gun manufactures, NRA and others are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Everything coming out of this administration- coal to soybeans, to auto parts, to steel is labeled national security when true be told its corporate socialism and another white collar federally funded jobs program.

Export of weapons (all types, make, model, purpose) need to remain with State department not commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-pm1m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1022

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Keiser

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Please take action to help make America and the world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ieu7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1023

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change. It is unnecessary and not smart. Good for criminals only. Is this what we want to encourage unlimited bad guys with unlimited weapons with unlimited power? Some rules were not meant to be changed. It takes wisdom to know that. It takes conscience to act upon it and stand up for what is correct.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-lysr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1024

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marissa Anonymous

General Comment

I oppose this change that would switch the regulation of firearms export from the US State Dept to the US Commerce Dept.

As a conservative, I am not against domestic gun sales, but I am against terrorism, and I feel strongly that national protection is more important than a few bucks of profit. We cannot let gun sales happen to foreign countries without tight regulation, and the US Commerce dept simply does not have the resources to adequately police foreign gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zzkg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1025

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Briggs

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule would also remove the State Departments block on the 3D printing of firearms, made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-68pz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1026

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rinya Frisbie

General Comment

I am strongly opposed to the proposed rule change that would transfer the oversight of non-military firearms exports from the State Department to the Commerce Department. The proposed rule is supported by the NRA and the only purpose is to increase the profits for the US gun industry--one that loosing support in the USA. The only entity that is requesting this change is the gun lobby and it expects this change will increase firearms exports by 20%. This will put more guns in the hands of terrorists around the world. It is even more dangerous because it moves supervision and oversize to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more; this makes no sense. This seems like one more attempt to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have killed too many civilians already. Please do not approve this blatant corporate giveaway. The world does not need more instruments of mass killing--only the gun lobby would think this is a good idea. We the people are watching as you make these decisions. Please make them wisely as you will be accountable.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-29zh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1027

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Hamm

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zte9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1028

Comment on DOS-2017-0046-0001

Submitter Information

Name: Teresa Freedman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-48oe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1029

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frank Hannwacker

General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S State Dept. to the U.S Commerce Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ojz4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1030

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-zn53 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1031

Comment on DOS-2017-0046-0001

Submitter Information

Name: Megan Condit-Chadwick

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress needs oversight of arms sales in order to ensure that the U.S. is not arming countries with human rights violations and those that may threaten our national security. The ban on 3D printing of weapons also needs to stay in place. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-99i8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1032

Comment on DOS-2017-0046-0001

Submitter Information

Name: Natalie Blasco

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am opposed to this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-ezaa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1033

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Catherine

General Comment

To Whom It May Concern:

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The proposed rule change would make the world a far more dangerous place for the following reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you for your considerations.

Sincerely,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-bmgi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1034

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margie Wagner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We don't need to arm the world; we already have enough problems with firearms and gun violence in our own country. How can we be assured that guns will be in the hands of those in the right rather than our enemies? Have we learned nothing from past mistakes with firearms? Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6gty Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1035

Comment on DOS-2017-0046-0001

Submitter Information

Name: nancy august

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Here are a few of the reasons why:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-qq7g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1036

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Here are details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

It would totally nullify the ability of the US to keep from arming dangerous foreign nationals, thereby making attacks on US soil far more likely.

This stupid idea to enrich the already rich arms dealers boggles the imagination!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-gwya Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1037

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joyce D

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department

would

facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and

terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-8gii Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1038

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It is unwise to increase access to these weapons domestically or internationally. I very much oppose this rule change as it would do much more harm than good.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-mthb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1039

Comment on DOS-2017-0046-0001

Submitter Information

Name: winn wilson

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-gmo2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1040

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jairo Angulo

General Comment

The Founding Fathers never intended for the average citizen to have semi-automatic and fully automatic guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vmpg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1041

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sue Summerfield

General Comment

We do not need semiautomatic guns in the hands of everyone! There are already too many guns in the hands of irresponsible individuals. Stop the nonsense! Think Compassion!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-sr6h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1042

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Johnmston-Walsh

General Comment

I am totally opposed to changing regulations of gun sale/exports from the U.S.State Dept. to the U.S. Commerce Dept. It would be against security for our country!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-kgos Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1043

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pat Dingleberry

General Comment

I think moving control of international firearms sales from the State Dept. to the Dept. of Commerce would be a huge mistake, especially because Congress would be out of the loop and this could have serious complications for the international community.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-qrzu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1044

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joyce Sanseverino

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Y

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-k082 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1045

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lucy Sommer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

For God's sake, don't do this. It is a disaster in the making.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-myt8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1046

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Karen Bates

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-50qh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1047

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Quinlan

General Comment

I strenuously oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-6wri Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1048

Comment on DOS-2017-0046-0001

Submitter Information

Name: laura harness

General Comment

Please keep arms regulations under the DOS to keep the world a safer place. Unregulated arms sales will increase violence in the world therefore increasing immigrants seeking asylum, such as those from central America. The commerce dept is focused on profit and isn't the appropriate organization to regulate arms sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-w75y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1049

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pat Annoni

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I STRONGLY oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-vnpw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1050

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kerry Krebill

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Other very scary aspects of this change are:

- It would eliminate the State Departments Blue Lantern program, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. This alone is REALLY terrifying.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-t1mr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1051

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ben Indig

General Comment

I am writing in opposition to a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Please do not make the primary focus of international arms sales into an effort to increase American exports of firearms to help American businesses. The primary issue here is and should remain the military consequences of such export sales. As such, the State Department should continue to be in charge of such export licences.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-cptb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1052

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Dewey

General Comment

I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-z5j5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1053

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joseph Barboza

General Comment

I oppose this proposed rule change... the Commerce Department absolutely should not be regulating international arms sales, period. That is the worst idea to come out of the administration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-3yf9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1054

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Connors-Keith

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S.

Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons

sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau

of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist

organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American

guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-5ejm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1055

Comment on DOS-2017-0046-0001

Submitter Information

Name: p perry

General Comment

Guns are not the answer to our ills. Please think twice before doing this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-myi3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1056

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Smarr

General Comment

I strongly oppose the transfer of licensing semiautomatic and other high-powered weapons exports from the U.S. State Department, which is focused on safeguarding our nation, to the U.S. Commerce Department, which is focused on promoting American sales. This would obviously greatly increase the unregulated sale of dangerous weapons to organized crime, tyrannical regimes, and terrorist organizations, making us all less safe. These gun sales would increase the violence that is causing mass migrations and the problems that entails for countries (here or in Europe) that are confronted with large numbers of refugees fleeing violence. Firearms are quite rightly categorized as military, and their export needs to be carefully restrained, not encouraged. Gun companies will profit; everyone else will be seriously harmed.

The proposed transfer would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking to criminal and terrorist purchasers. The Commerce Department does not have the means to check on and enforce regulations on the sale of weapons all over the globe. There will be a free-for-all of arms sales to the people and groups most dangerous to global peace and stability.

Furthermore, the proposed transfer would remove the State Departments block on the 3D printing of firearms. Once instructions for how to 3D print weapons were posted online, the State Department successfully charged the person posting that with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. More lethal weapons in the wrong hands mean more deaths of good and innocent folk. The proposed transfer of weapon exports from the State Department to the Commerce Department is totally irresponsible and extremely dangerous to the safety of everyone. I strongly urge you to oppose this proposed change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-goxr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1057

Comment on DOS-2017-0046-0001

Submitter Information

Name: J Robuck

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-bu84 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1058

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christina Sullivan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-glfo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1059

Comment on DOS-2017-0046-0001

Submitter Information

Name: Georgia Shankel

General Comment

People in my family have dies from gunshot wounds. People are murdered everyday in the City of Chicago. I hear gunshots at night after I go to bed or while I'm watching TV. This has to stop.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-w91v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1060

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joseph Lawson

General Comment

The regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It must not happen!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-st71 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1061

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lauren vreeland long

General Comment

Firearms exports must stay within the state dept and not the commerce dept where it will not have oversight.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-7c5f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1062

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Zimmermann

General Comment

I write regarding the pending plan to switch the regulation of firearms exports from the State Department to the Commerce Department

This is a bad idea that would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place for several reasons. First, it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Secondly it would remove licensing requirements for brokers, increasing the risk of trafficking. Third, it would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. That cannot be good.

Please do not allow the regulation of firearms exports to be taken away from the State Department, such a move would be enormously irresponsible and damaging to the safety of these United States. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-xo7x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1063

Comment on DOS-2017-0046-0001

Submitter Information

Name: A Patterson

General Comment

I oppose the rule change switching the regulation of firearms exports from the State Department to the Commerce Department. That rule change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Please do NOT change it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942r-cxuo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1064

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Soares

Organization: none

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-1z2d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1065

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kae Bender

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department focuses on safeguarding our nation whereas the U.S. Commerce Department focuses on promoting American business. Clearly the concern of firearms in the wrong hands is of fundamental concern to the State Department, whereas the Commerce Department would only want to sell more arms abroa. We must insist that the security of our nation take precedence over the profits of some arms providers.

Firearms exports are rightly classified as military" and blocking sales of large batches of firearms to foreign countries is a reasonable control to prevent the unleashing of weapons into the hands of those who could cause serious harm to human rights, international relations, or even our own national security. Further, commercial export of large caches of American guns and ammunition could make it too easy for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain enough weapons to wreak havoc around the world. These are serious concerns.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Exporting firearms should be subject to more controls, not less! The Commerce Dept. is NOT ready or able to maintain the stringent controls and oversight that is needed to keep weapons trade restricted enough to handle export licensing, shipment inspections, and other appropriate restrictions on the types, quantities, and categories of firearms exports.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-sl87 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1066

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Olivier

General Comment

I reject changing from state dept to commerce department regulation of international gun sales.
Everything we do destabilizes the world with violence.it is unconscionable to sell more weapons.
Sincerely Carol Olivier

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ulio Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1067

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Boss

General Comment

Don't allow the NRA to dictate what is best for our national interests with this new proposed rule. It will only make the world less safe in the end. So please reject this rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-do6t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1068

Comment on DOS-2017-0046-0001

Submitter Information

Name: Connie Marquez

General Comment

We need more controls over guns and weapons, and fewer of them.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-khcv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1069

Comment on DOS-2017-0046-0001

Submitter Information

Name: Faye Soares

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2]

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ni6g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1070

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maryellen Redish

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-s5bi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1071

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cathleen Scharosch

General Comment

No sale of firearms to foreign countries!!

No change of firearm management from US State Dept to US Commerce Dept!!

There is no common sense in making any of these changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-9a1x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1072

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bree M

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The proposed rule would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. The risk of trafficking would increase because there would no longer be licensing requirements for brokers.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This rule would create more unnecessary chaos and violence.

Keep more controls on guns, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8z8n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1073

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Kissane

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The rule change would make the world a far more dangerous place.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

All of these changes will make the world more dangerous and our country less secure. Please do not enact this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-t0v7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1074

Comment on DOS-2017-0046-0001

Submitter Information

Name: donnasue jacobi

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. those guns will only be used against USA citizens -- try to get a handle on safety.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-fvyj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1075

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betty Kissilove

General Comment

I very strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with very serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-18g5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1076

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Dingman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Please keep the regulations of firearm export under the responsibility of the U.S. State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-s53s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1077

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrew Aguiar

General Comment

We dont need more commerce involving the gun trade!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-s9uc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1078

Comment on DOS-2017-0046-0001

Submitter Information

Name: Francis Fedoroff

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are weapons not commodities. Gun sales require special oversight.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-cjj8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1079

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Yeomans

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Guns have only one use and that is to kill.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-3tru Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1080

Comment on DOS-2017-0046-0001

Submitter Information

Name: Edward Esler

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. I oppose any rule change here.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-2yct Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1081

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Maynard

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-gp37 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1082

Comment on DOS-2017-0046-0001

Submitter Information

Name: robert keenan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-perh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1083

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Smaluk-Nix

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-1x33 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1084

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bart Ryan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Also...

More guns against America is more guns against America, no matter how thinly or big you slice it for Republicans or for Democrats. Even the Trump administration should realize how destructive and dangerous this really is.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-4h0s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1085

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kim Myers

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. How many more people have to be gunned down in the world or will it take the murder of someone in your family for it to finally hit home! I am trying to raise my 7 and 8 year old granddaughters, and if I could move to any other country to escape what is happening to America, I surely would. I do not want to raise them where going to school has become deadly. I am embarrassed to be an American. It is only about the money anymore.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-zfry Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1086

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rene Maas

General Comment

Hi I am a regular working mom whose kids are grown - so I don't worry about them in school now. However, if the State Department gives up control of gun and ammunition sales around the world, there is a terrible tragedy waiting to happen in another country with guns from the US. The State Department has more resources to track large sales and shipments and to keep Congress informed of these developments.

Please keep tracking of worldwide gun sales within the State Department - to keep us and the world safer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-z7k8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1087

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeffrey Greif

General Comment

Firearms exports should continue be classified as "military" and remain under the control of the Department of State. I oppose the proposed rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-7lnq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1088

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch regulations of firearms export from US State Department to US Commerce Department. No! We have too many guns and gun deaths here in the US already.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-bvck Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1089

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lowell Richardson

General Comment

Why would we switch the regulation of firearms exports from the State Department to the Commerce Department? Our government should not be in the business of promoting lethal firearm sales around the world. We should reducing

We must limit firearms exports to oppressive regimes, not encourage them. We must strengthen safeguards that help keep organized crime and terrorist organizations from obtaining weapons, not weaken them.

Why would our government eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them?

One good example of the danger of unregulated gun sales is the rampant smuggling of guns across the Mexican border. The vast amount of weapons easily available across the boarder, sourced from unregulated American gun shows has turned Mexico into a killing field. We do not need to promote the same death and destruction in other parts of the world by removing licensing requirements for brokers.

And removing the State Departments block on the 3D printing of firearms BY transferring the authority to the Department of Commerce is simply ridiculous.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-j29i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1090

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Zwick

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-rux5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1091

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tom Secco

General Comment

Do not transfer export license responsibility for semiautomatic weapons etc. to the Commerce Dept. Sane rational people who have foreign policy interests as the basis of their decision making must be in control not the expedient mercenary interests like the NRA that dominate the Commerce Dept. Their licensing practices would help create violence on a massive global basis, all based on the love of money and their appetite for violence. Stop this movement away from prudence and reason.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-6oh4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1092

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Diaz

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Currently, firearms exports are classified as Military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far less hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The following details on how the rule change would make the world a far more dangerous place concerns me:

- It would eliminate the State Departments Blue Lantern program (in place since 1940), which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Again, I oppose the rule change because of all the dangers posed; it would make it easier for U.S. gun manufacturers to export firearms.

Please take action to help make our country and our world a safer place.
Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-4llc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1093

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha White

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-5r4g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1094

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jim Yarbrough

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would dangerously reduce control and oversight of firearms. Firearms export should continue to be regulated by U.S. State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ik0p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1095

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen Knutsen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-n8up Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1096

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Beth Osnes

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-cs02 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1097

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dennis Alanen

Organization: none

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ojpj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1098

Comment on DOS-2017-0046-0001

Submitter Information

Name: Samantha Turetsky

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-cw5d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1099

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dennis Bricker

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-m9pj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1100

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Lilly

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!
Stop the carnage of our children and all people! You have the power and therefore the responsibility!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-9zo1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1101

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Meisenheimer

General Comment

I can't even imagine that anyone who has followed the human carnage that arms dealers bring could even think of moving the regulation of selling of firearms from the US State Department to the Dept of Commerce. This is actually even worse than the other dozens of horrible things that have been proposed lately. Its worse than helping the ice caps melt.Its worse than drilling in the artic or putting lobbyists in charge of regulating pollution. Nothing is worse for individual suffering than more firepower. Dont even think about it!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8e6p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1102

Comment on DOS-2017-0046-0001

Submitter Information

Name: Virgil Pauls

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department

successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-jjq6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1103

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Goettling

General Comment

I think giving the gun industry, the right to sell arms internationally, without the state department overseeing the sales is a global disaster waiting to happen. Military weapons should only be sold to the military, not citizens.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-z7va Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1104

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Kleymeyer

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ujzk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1105

Comment on DOS-2017-0046-0001

Submitter Information

Name: jef weisel

General Comment

keep state department in charge of export licenses for weapons, especially semi- and automatic weapons!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-14im Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1106

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Alice Lo Cicero

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8b2k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1107

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gail Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-dewa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1108

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Krausz

General Comment

Currently, firearms exports are classified as military. Thus, they are regulated by the State Department. The advantage of the current regulatory system is that Congress can block sales of large batches of firearms to foreign countries, including countries with human rights abuses. With the proposed rule change addressed here, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, again, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This situation would be problematic because it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. Further, it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe, again, posing a serious threat to both national security and potential human rights abuses around the globe. For these reasons, I am against the proposed rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ubl3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1109

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Holcomb

General Comment

The US is already one of the largest exporters of weapons. Please do not make this world more violent by enacting the proposed rule .

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-xo6b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1110

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gena DiLabio

General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The proposed rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please keep the regulation of firearms under the control of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-jw49 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1111

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margie Zalesak

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-8sli Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1112

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Borelli

General Comment

Do not change the regulation of firearms exports from the State Department to the Commerce Department. The Commerce Department is not equipped to provide oversight of firearms exports. There would be an enormous risk of weapons getting into the hands of dangerous entities, and the world would be a much more dangerous place. Keep the regulation of exported firearms under the watchful eye of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-hqvl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1113

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Ente

General Comment

I strongly oppose the proposed rule that would shift responsibility for oversight of international arms sales from the Department of State to the Department of Commerce. Widespread export of military grade weapons outside the U.S. poses a serious and credible threat to national security, meaning control should be vested in the State Department not in the Commerce Department whose primary interest is business expansion and profitability. In addition, it is clear that the Commerce Department has neither the staffing levels nor the expertise required to monitor and manage arms sales abroad.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-l4ou Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1114

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beth Levin

General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ye5x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1115

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sue Whitlock

General Comment

ARE YOU CRAZY?!?! You want semi-automatic machine guns and other military guns in ANYBODY'S hands?!?! We would have no more national security and a lot of people would get killed!! Do not pass this!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-298i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1116

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is an all around bad idea that would make everyone less safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-ostj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1117

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Walker

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-plhp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1118

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-pszn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1119

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dan Anonymous

General Comment

The Trump/Pence fascist regime must go!!!!!! In the name of humanity we refuse to accept a fascist America.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-9yhu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1120

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Edwards

General Comment

Dear committee:

I am Anne Edwards a resident of California. The export of U.S. made firearms is not a wise or ethical commercial business. Oversight belongs in the U.S. State Department. It is already shameful and frightening enough to have our American people and our new US immigrants shot down by weapons poorly regulated here in the mainland United States. If we allow the export of guns to become a commercial enterprise and not a State Department peace regulated issue, we push more violence on others and ourselves.

"I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Sincerely,
Anne S. Edwards.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-7kpa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1121

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Meckler

General Comment

I oppose moving the regulation of overseas gun sales from the State Department to the Commerce Department. Guns are for killing people. They are not commodities to be sold like soybeans. They are ugly, killing machines. They should NOT be treated as if they were harmless merchandise. Why are we as a nation promoting killing?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-m6nj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1122

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Jackson

General Comment

WE HAVE FAR TOO MANY GUNS ALREADY .. DO NOT CHANGE THEIR REGULATIONS
FROM THE STATE DEPARTMENT TO THE COMMERCE DEPARTMENT !!!!!!!!!!!!!!!!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-t058 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1123

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Dawson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule

change,

Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Sincerely,

Nancy Dawson

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-zyor Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1124

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Dickson

General Comment

Please do not open the flood gates of weapon sales to all outside the United States which is what would happen if this became a 'business/commerce' decision rather than, as is the case now, your decision. We should not become arms sellers to the world - including terrorists and oppressive regimes. There are enough weapons in the world already to kill everyone many times over. Let's not make our country the one to add to this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-claq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1125

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martin Watts

General Comment

Believe it or not , NOBODY else on Earth wants to be like the US ! Especially regarding gun laws !
Time the government became a lot more like the rest of the human race , and BANNED GUNS from the public !!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-rjxd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1126

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lois Zeidman

General Comment

I am strongly opposed to the change of oversight of international gun sales. The Department of Sate, NOT the Department of Commerce, is the Department that currently is in charge of this and should continue to be to overseeing Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-2jpp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1127

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Premo

General Comment

I oppose this new rule that will change the export of firearms from the US State Department to the US Commerce Department!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-qms3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1128

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Wood

General Comment

I am strongly opposed to the proposal to change the regulation of firearm sales from the state department to the department of commerce. A move like this would likely destabilize many other countries and places in the world by providing easier access to firearms with fewer regulations on who can purchase them and for what purpose. Firearm sales outside of the US are military deals and should be regulated and controlled tightly. I believe the state department is better equipped and prepared to provide this regulation than the commerce department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-rohj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1129

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing to strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This switch would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This rule change would make the world a far more dangerous place, and I urge you to decide against it. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-d9jf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1130

Comment on DOS-2017-0046-0001

Submitter Information

Name: Walter Bishop

General Comment

The arms that are sold are used to kill people. Charlie Chaplin made the movie, "The Great Dictator" in 1940 as a satire on dictators and war. President Eisenhower warned of the military/industrial complex. This change is to make arms sales easier on the international market for the arms companies profits and the worlds determent.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-o4bj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1131

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jorge De Cecco

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thanks for rejecting this proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-7ez7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1132

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ruth Sugerman

General Comment

My understanding is that most of the guns and ammunition in Mexico and other Central American countries come from the U S. Anything that increases this flow of arms to gangs and cartels will send more asylum seekers this way. We must be more responsible about arming criminals abroad.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-dm54 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1133

Comment on DOS-2017-0046-0001

Submitter Information

Name: Georgeanne Matranga

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Thank you for your attention to my profoundly grave concerns.

Sincerely,
Georgeanne Matranga

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-pgwh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1134

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dr. Demian

General Comment

DO NOT change the U.S. State Department rules regarding firearms exported from America.
DO NOT allow the U.S. Commerce Department to have control of exports.

Thank you.

Dr. Demian

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-14mi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1135

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-1v3q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1136

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jenny Stanley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-m2qy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1137

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Anderson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

These weapons cause loss of life here at home in the US & we do not need to put them in the hands of possible terrorists or others with an agenda against the US. So many groups around the world would immediately use the weapons not for defense but for offense, to support causes the US does not support & take innocent lives. Let's not make it easier for them to get their hands on our weapons!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-dun1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1138

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn McClure

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. As a nation, we have already exported so many firearms to Mexico and Central America, that we are ruining their societies, making them more violent each day. I know with our present administration and their focus on money-making for the US, to move this to the Commerce Department would do this in so many other countries, as well. We must stop this harmful practice!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942s-wq8q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1139

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Lindsay

General Comment

I oppose the proposed rule change that would switch the regulation of arms sales from the State Department to the Commerce Department. The US serves as a model by utilizing the special resources of the State Department to assure that arms exports are legal and dont result in international arms sales that may support rogue operators and illegal or terrorist activities abroad. State Department regulation of international arms sales helps assure that this unique type of commerce aligns with American foreign policy. The Commerce Department lacks the expertise and resources needed to provide this same type of oversight.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-9pkq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1140

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jonathan Boyne

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-qwwwx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1141

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean King

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change would

1. eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. remove licensing requirements for brokers, increasing the risk of trafficking.
3. remove the State Departments block on the 3D printing of firearms. The rule switch would effectively enabling 3D printing of firearms in the U.S. and around the world.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-ea7v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1142

Comment on DOS-2017-0046-0001

Submitter Information

Name: phillip pierce

General Comment

do not change the rules just for the NRA !!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-ufcj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1143

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Setterberg

General Comment

Please do not move firearms registration/sales from the US State Department to the Commerce Department. The State Department is much better equipped to handle this task.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-d74r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1144

Comment on DOS-2017-0046-0001

Submitter Information

Name: RedLion York

General Comment

Howdy,

Switching the responsibility for overseeing weapons sales from the State Dept to the Commerce Dept is a bad idea for these reasons:

- a) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- b) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- c) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The world is dangerous enough. We don't need this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-6jvl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1145

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Wellemeyer

General Comment

Moving handling of export licensing of weapons shipped overseas from the Department of State to the Department of Commerce would flood the world with military type weapons. Organized crime and terrorist would have almost unrestricted access to high firepower weaponry. Violence prone dictatorships, and countries with few or no human rights protections could indiscriminately murder more of their citizens. Congress would not be automatically informed of large firearms shipments that it may have good reason to ban. Commerce doesn't have the staff or the training to carry out pre-license and post-shipment inspections and submit the required reports. It would also remove licensing requirements for brokers, increasing the possibility of trafficking, and it would remove the block on 3D printing of firearms. In effect, this would allow anyone with a 3D printer to produce lethal weapons.

Firearms are deadly. They are used to kill people every day, around the world, in acts of political violence, terrorism, organized crime and human rights violations. They must be subject to more controls, not fewer.

I strenuously oppose the rule change that would switch regulation of firearms export from the Department of State to the Department of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bgo9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1146

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. In my opinion, this is a bad decision that could have implications affecting our national security, and should be rejected outright.

Thank you for your time,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-wa7i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1147

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jo Coscia

General Comment

I oppose the switch of regulation of firearm sales from the state department to the commerce department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-lfcn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1148

Comment on DOS-2017-0046-0001

Submitter Information

Name: Phillip Crider Jr

General Comment

This particular change could potentially create a threat to United States national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-lw09 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1149

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gerri Battistessa

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-h2wj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1150

Comment on DOS-2017-0046-0001

Submitter Information

Name: Arlene Thomas

General Comment

Allowing arms sales outside of the US via the Commerce Dept. is much more of a threat to our national security than small children at our borders. This change further endangers our country...as have so many things proposed by this administration. Out of country arms sales should be regulated with legislative oversight as is currently the case. Do NOT allow this rule change to go forward.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-2f43 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1151

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please do not transfer regulation of international arms sales to the Commerce department. The last thing we need is more international weapons trade. You know many of the guns will end up in the wrong hands and come back to bite us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-3zuu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1152

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Peery

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. To do otherwise endangers all human beings and leaves the U.S. open to huge liability issues.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-jhyj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1153

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrea Bonnett

General Comment

I oppose this rule that would switch regulations from the US State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-5u9h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1154

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Schwinberg

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. Commerce Department is focused on promoting American business, not on safeguarding the nation, which is the responsibility of the U.S. State Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-taiw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1155

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Mach

General Comment

The handling of export licenses for gun sales needs to stay in the hands of the State Department. The Commerce Department has no business dealing with this issue!

If we allow the NRAtO to manipulate these changes, the following issues arise:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please DO NOT allow these dangerous changes to be bought by a group that is not looking out for the welfare of this country, nor the world!

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-l9sp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1156

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Peery

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. To do otherwise endangers all human beings and leaves the U.S. open to huge liability issues.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1n64 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1157

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Harrison

General Comment

I oppose this rule change. This transfer of authority from State to Commerce would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-hgig Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1158

Comment on DOS-2017-0046-0001

Submitter Information

Name: Wallis Anonymous

General Comment

We are responsible for so much terrorism around the world because of weapons. Turn off the spigots of murder, kidnapping, from Central America, and the world. Bad legislation, which will increase terrorism for all good people of Earth.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-cilx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1159

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gale Green

General Comment

Please do not put the sales of guns in the hands of the U.S. Dept. of Commerce. It is far too big of a responsibility for the people there to be expected to make life and death decisions on the fate of dangerous weapons.

In reality, the responsibility of a governing body is much more in line with reigning in the rampant gun industry that threatens the lives of men, women and children everywhere. There needs to be sober thought and discussion before ever risking the lives of many who encounter the dangerous side of weapon proliferation. God be with you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-sns0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1160

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Magne

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. A move like this will make the world much more dangerous. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- * It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- * It would remove licensing requirements for brokers, increasing the risk of trafficking.
- * It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-louq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1161

Comment on DOS-2017-0046-0001

Submitter Information

Name: Arturo Urista

General Comment

I OPPOSE the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Presently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as Turkey and the Philippines.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far less hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program (in place since 1940), which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized

crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Again, I oppose the rule change because of all the dangers posed; it would make it easier for U.S. gun manufacturers to export firearms.

Keep America, our country and our world a safer place!

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bw8i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1162

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Stofsky

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The world does not need any more American guns!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-9g2w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1163

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-67o9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1164

Comment on DOS-2017-0046-0001

Submitter Information

Name: anonymous anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1plc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1165

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn Ichioka

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-soza Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1166

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mo Kafka

Organization: 262-B Bradford St.

General Comment

Thank you for considering this important concern. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It is essential that this rule not be changed as it will not benefit national security or international relations and it will make the world a more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-rljn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1167

Comment on DOS-2017-0046-0001

Submitter Information

Name: Onishea Aguilera

General Comment

I myself love guns but I do not support these weak gun laws and I never will support the crooked NRA!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-g4vl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1168

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sean Kelly

General Comment

I strongly oppose shifting firearms oversight from the State Department to the Commerce Department. Streamlining and encouraging the sale of firearms, and reducing inspections and enforcement, is solidly AGAINST the interests of the U.S.:

Internationally, high firearm availability correlates strongly with high firearm violence and fatalities.

Making firearms more available WITHIN the U.S. by putting less scrutiny on shipments is the OPPOSITE of what we need to do in a climate of increasing criminal shooting acts.

Many of the most pressing international crises, from conflict in the middle east to the migration crisis from Central America, are fueled by violence utilizing American-made weapons. By making it easier to get American firearms abroad, we are only jeopardizing our OWN national interests.

While it is ultimately impossible to outright prevent individuals from acquiring information to design and/or manufacture firearms and components via 3D printing techniques, it is senseless to remove existing barriers to doing so. More firearms of questionable quality in the hands of more people with questionable training is an absolute recipe for disaster.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-yps2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1169

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Always

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-83df Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1170

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Bernard

General Comment

I urge prevention of this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are of killing people, and this is a national security issue, and not just some trade issue.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-qxx5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1171

Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Shook

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-grj4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1172

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Pasternack

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-x60b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1173

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pete Wilson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-9yri Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1174

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Gunderson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-t4on Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1175

Comment on DOS-2017-0046-0001

Submitter Information

Name: Max Nupen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-k0d3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1176

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Lemmon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It seems IRRESPONSIBLE to hand over such a sensitive matter to our national security to a body focused on commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-jtzd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1177

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Cervene

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-qgg3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1178

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the change of regulation of firearms exports from the State Department to the Commerce Department. I feel this would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are not a mere commodity and need the oversight of the State Department as they are a national security concern.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-g7nf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1179

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Bissell

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- 1.) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2.) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3.) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-j9og Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1180

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Malcolm

General Comment

Great idea. Let's sell our enemies the weapons they need to use against us. As long as someone is making money, it should be OK (?) Are you out of your goddamned minds?

This is a legitimate question.

John L. Malcolm

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-6usb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1181

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Diehl

General Comment

Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-p4gr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1182

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ron Unger

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This is a blatant attempt to hide weapons sales from public oversight and to bypass existing controls over weapons exports which benefit no one on earth except the owners of the weapons manufacturing companies.

This rule change is not in the best interest of the people inside or outside of America and should not be approved.

We need less proliferation of weapons around the world, not more. This proposed rule change will result in more death and destruction and physical and psychological damage with no benefit to anyone except a few who will profit handily from the increased sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-ddqy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1183

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marjorie Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-gv8d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1184

Comment on DOS-2017-0046-0001

Submitter Information

Name: Colleen McGlone

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-o3u0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1185

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose changing the regulation of firearms exports from the State Department to the Commerce Department. That change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration, making the world a far more dangerous place. The Commerce Department is not equipped to manage the global security issues that the rule change would cause.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1bpx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1186

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Mobley

General Comment

We MUST stop these guns that are killing our children! NOW!!!!!!!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-1lmt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1187

Comment on DOS-2017-0046-0001

Submitter Information

Name: Wendy Walker

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Please do not allow this to happen. BAD idea.
Wendy Walker

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-kj83 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1188

Comment on DOS-2017-0046-0001

Submitter Information

Name: Montie Richards

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for national security. Weapons could be sold even to countries where there are serious human rights concerns, such as the Philippines and Turkey, and I understand Congress would no longer be automatically notified so it could stop such sales. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bddb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1189

Comment on DOS-2017-0046-0001

Submitter Information

Name: ELLIOT PLINER

General Comment

I OPPOSE THIS RULE CHANGE THAT WOULD SWITCH THE REGULATIONS OF FIREARMS EXPORT FROM THE U.S. STATE DEPARTMENT TO THE U.S. COMMERCE DEPARTMENT.

THE COMMERCE DEPARTMENT DOES NOT HAVE THE RESOURCES TO ADEQUATELY ENFORCE EXPORT CONTROLS.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-zmw9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1190

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-bs2l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1191

Comment on DOS-2017-0046-0001

Submitter Information

Name: Matthew Boguske

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-hpba Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1192

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katy Paynich

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department because switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-awuq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1193

Comment on DOS-2017-0046-0001

Submitter Information

Name: Justin Mebane

General Comment

This rule change will transfer regulation of foreign arms from the State Department to the Commerce Department - which does not have the resources necessary to keep track of these sales. This would be a major threat to our national security and fuel instability in other countries - increasing migration to the US. This rule needs to be rejected immediately.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942t-c0hb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1194

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Olcsvary

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Military equipment could very well end up in the hands of people we'd rather not have them.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-kene Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1195

Comment on DOS-2017-0046-0001

Submitter Information

Name: Miriam Dunbar

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-99es Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1196

Comment on DOS-2017-0046-0001

Submitter Information

Name: Craig Emerick

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense

Distributed founder Cody

Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-o01r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1197

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elliot Ross

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-yy53 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1198

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donia Connell

General Comment

The NRA only cares about making a buck. This switch could and most likely would benefit terrorist groups being funded by corrupt countries.

If the NRA gets their wish, all the countries weve unjustifiably attacked, who with good cause now hate us are certain to have top of the line weapons to kill us with.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-63me Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1199

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Heisler

General Comment

Arms sales need to be even more restricted and regulated, not less. US arms sales are contributing to massive terrorism and human rights abuse because of our loose oversight.

.The American people are sick of the control the NRA has over the legislators who swore to protect and uphold the will of the American people. The NRA is and operates as a criminal syndicate with the republican party as it's paid agent in congress.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-mm31 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1200

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Wasserman

General Comment

Please do not change the rules about allowing guns into this country. Do not bow to the NRA, You Republicans have done enough of that . I guess you enjoy people getting killed in this country/ another way you are ruining it/only making your pockets great !Shame Shame on Republicans!! History will tell what you have done to this country to ruin it. Linda W RN MN

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-rrhh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1201

Comment on DOS-2017-0046-0001

Submitter Information

Name: robert moeller

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I OPPOSE THIS PROPOSED CHANGE.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-34ro Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1202

Comment on DOS-2017-0046-0001

Submitter Information

Name: S Phillips

General Comment

Guns are danger and kill humans. They should not be exported to other countries and risk being obtained illegally through the black market for terrorists and others to obtain them. The safety of humanity is more important than financial gain.

Please do not allow a change in these rules.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-u3db Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1203

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Lapetino

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-eqjp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1204

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Hall

General Comment

I strongly OPPOSE changing the classification of selling firearms to foreign countries that would switch such sales from the US State Dept. to the US Commerce Dept.
Selling weapons to other countries is not selling a commodity, like wheat; it is selling lethality and this needs the continued oversight of the State Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-huz4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1205

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-7zlv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1206

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Ryland-Anderson

General Comment

I oppose any regulation change Regarding the administration of export of guns change over to the Commerce Department. This is definitely something that needs to be under the State department. This is a crucial matter regarding foreign affairs. This is not a commercial matter. To keep our country safe from terrorism and organized crime our state department has always been and should continue to be the correct governing body to regulate export and overseeing a gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-bc97 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1207

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Morgan-Hickey

General Comment

Stop the promotion of guns in the United States or around the world-

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-8y2x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1208

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrew Reegen

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Keep the State Department in control of the regulation of firearm's exports.

Thank you

Andrew Reegen

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-wi5r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1209

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shoshana Katz

General Comment

I understand that it is proposed to move the sale of assault rifles from the state department to the commerce department. If this is allowed to go through we will probably wind up supplying the world, especially all the wild crazies out there with the very best American arms. What happens when we have to send American soldiers to various parts of the world to rein in the crazies. Something is really wrong here.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-d5bn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1210

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Peters

General Comment

I am greatly concerned about the proposed transfer of firearms sales to the Department of Commerce. More than ever before in the history of this nation, firearms are being sold and bought for military purposes, and used by repressive governments and paramilitary groups against their own citizens, not only dissidents but also residents of regions whose resources are being sold off to outside corporations. Gang-like power is proliferating. It is essential that firearms sales be regulated by the State Department, which is concerned about our international relations and the opinion held about the United States in other parts of the world. My own safety as a citizen depends on an improvement in our behavior as a nation.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-qm1e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1211

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anneliese Schultz

General Comment

I oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe this would be an extremely dangerous, causing arms sales to vastly increase internationally, with serious implications for our national security.

If this change were made, firearms exports to oppressive regimes would be facilitated, safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons would be removed, and the violence that destabilizes countries and causes mass migration would be fueled!

Please oppose this terrible proposal, and help keep our country safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-chgl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1212

Comment on DOS-2017-0046-0001

Submitter Information

Name: Theodore Voth

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-2ihv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1213

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janice Wilfing

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-9n69 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1214

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lesli Clements

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-3vmq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1215

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Fischer

General Comment

It is INSANE to sell guns to everyone and not expect them to be turned on us! Please do NOT loosen the rules for firearms export, just to allow for greedy Corporate Profit.

Right now, firearms exports are classified as military (as they should be). This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-o8r0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1216

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alex Escott

General Comment

Hi i am a Gun owner and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. thankyou for reading

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942u-xn1w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1217

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lauren Schiffman

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! I oppose the proposed changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-q48g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1218

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betty Winholtz

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

But this is not just dangerous for people in other countries: weapons made here can be used against us by outsiders.

What are you thinking!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-1920 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1219

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Stout

General Comment

I do not want the handling of export licenses of semiautomatic assault rifles and other powerful military style firearms moved from the U.S. State Department to the U.S. Commerce Department. Regardless of how profitable the sales of more US made weapons would be to our firearms manufacturers, producing and selling more weapons to more nations of our violent planet would ultimately undermine US safety and security. Criminals and terrorists would use these additional weapons to prey upon Americans and our friends abroad and in our own country. There are already too many weapons loose in the world already. I am a retired US Army combat veteran, and I served to protect my country and our allies and friends, not to promote the profits of GREEDY multi-national corporations. Furthermore, our arms industry should be completely nationalized in order to produce necessary weapons and military equipment for our forces and those of our allies at lower cost and remove the profit motive for selling weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-sxx0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1220

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Haguewood

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-nxjr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1221

Comment on DOS-2017-0046-0001

Submitter Information

Name: Clay Woody

General Comment

The gun industry is not content, it seems, with unleashing death and maiming on US citizens; now they want to export our violence--all in the name of greed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-qi1a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1222

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tiffany Freer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-31my Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1223

Comment on DOS-2017-0046-0001

Submitter Information

Name: Will Branch

General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change may be beneficial to American business, but it is detrimental to American security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-328h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1224

Comment on DOS-2017-0046-0001

Submitter Information

Name: Antonio Suico

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-s11o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1225

Comment on DOS-2017-0046-0001

Submitter Information

Name: C Lenihan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change the NRA is pushing for, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

In addition, the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-hld5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1226

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeanne Graffin

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the proposed rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-a6gv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1227

Comment on DOS-2017-0046-0001

Submitter Information

Name: Doreen Cameron

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-5mdj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1228

Comment on DOS-2017-0046-0001

Submitter Information

Name: Harold Johnsen

General Comment

The CORRUPT and IDIOTIC proposal to switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes; would remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons; and would further fuel violence that destabilizes countries and causes mass migration.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the CORRUPT and INCREDIBLY STUPID proposed rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The CORRUPT and DANGEROUS proposal to switch the regulation of firearms exports from the State Department to the Commerce Department would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and PUBLICLY REPORTS on them.

The CORRUPT and DANGEROUS proposal would remove licensing requirements for brokers, increasing the risk of trafficking. The CORRUPT and DANGEROUS proposal would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The CORRUPT and DANGEROUS proposal would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Pence and Trump Republican nation-robbing cabal is NOT TO BE TRUSTED! STOP this CORRUPT and DANGEROUS proposal NOW!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-ni4v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1229

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stella Kostopoulos

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-jyvv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1230

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Johns

General Comment

We oppose this deal with the NRA. The NRA has no right to do this. We will continue to speak out and speak out we will. We demand answers right now. We demand the truth right now. This is a very big deal now. This is a very serious matter and issue right now. How does this make it safe? It does not make it safe. This will not go away anytime soon. Gun control has been a huge issue right now. The NRA has their hands in things they shouldn't have in. We don't have a safe America anymore. Our children don't feel safe in School anymore. How does this make it right? It does not make it right. We are here to make sure that our schools are safe. We are here to make sure that we feel safe outside of our homes whether it would be in parking lots, malls, movie theaters, churches, walking, parks and play grounds. We need to make sure that everyday people don't have to fear for their lives anymore. Criminals and guns do not mix. Keep the guns off the streets. Guns are not toys. Guns are dangerous. Whatever happened to safety first? Whatever happened to respect and common sense? Whatever happened to morals and values? To many innocent lives have been taken already. Families of the victims are upset, angry and frustrated on how the NRA is truly acting. We are all upset on how the NRA is acting these days. It is truly unfair to us. It is unfair to the families that lost loved ones. We will keep making noise until things change for the better. Whatever happened to the gun laws? The laws that we have now don't even work anymore. We are looking out for the families that lost loved ones. No one else seems to care anymore! Why is that? We are very disappointed in our government and lawmakers. We don't want to see anymore innocent people killed. Is this to much to ask? Think is the children and the schools!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-rw5g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1231

Comment on DOS-2017-0046-0001

Submitter Information

Name: Edward LeBlanc

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-brdf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1232

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nola Hansen

General Comment

I am opposed to the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security!

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the

Firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! We need to make the world a safer place. I am opposed to this rule change. Please dont do it. Our safety is more important than gun makers making more money.

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-lufy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1233

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dave Kisor

General Comment

Safety is not what the NRA and the gun industry are concerned with. It's sales. They don't care who shoots who, they only see their profit margin going through the roof. The only problem is there are already too many guns out there already. The only positive here is American weapons tend to jam more often than European and Asian weapons, so the American profit margin probably won't be as high as they would like. To that end, the American manufacturers will undoubtedly whine like babies about unfair competition. American manufacturers don't focus on efficiency, but rather mega sales; whereas, European and Asian manufacturers strive for efficiency. During WW2, the Luftwaffe had Rhinemetal design and build a 30MM cannon for their fighters that could take down a bomber with 5 to 7 rounds outside of the range of our 50 calibers and they did it. Bomber crews called it the Jackhammer and it terrified them. A Soviet Sergeant named Kalishnakov acquired a German machine gun on the Eastern front and made some modifications. It was used in the early part of the Korean Conflict and the Army wasn't concerned. After Shenyang got it and put a sealed receiver group in it, our Armed Forces became very concerned over this new weapon, that was to become the most widely used a popular weapon in the world today, the AK-47. Don't expect American weapons to replace that anytime soon.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-glnc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1234

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alan McKnight

General Comment

I strongly oppose the rule change that would move control of export licenses for firearms from the State Department to the Commerce Department. The Commerce Department is not equipped to prevent the sale of firearms to foreign countries where violence and crime and military conflict are rife. Semiautomatic assault weapons and other powerful firearms can destabilize these foreign regions and cause populations to flee across borders to save their lives. The State Department knows where arms should not be exported to, and it is responsible for protecting Americans from the impacts violence elsewhere, including organized crime, civil unrest and terrorism. The Commerce Department, on the other hand, is focused on promoting businesses, has little incentive to block sales, and lacks the staff to track hotspots where exporting firearms could be harmful and dangerous to our interests.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-xp3p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1235

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary McLaughlin Sta. Maria

General Comment

I oppose switching control of firearms from the State to the Commerce dept. Be ashamed if money is worth that to you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942v-j8b2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1236

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Sparks

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-3wx6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1237

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gloria Morrison

Organization: TMPA

General Comment

shame

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-jt4o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1238

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Baker

General Comment

I am appalled at the idea of removing regulation of firearms exports, which would be the practical effect of having the Commerce Department "regulate" firearms sales. This opens the door to gun purchases by terrorists and repressive regimes, with no congressional oversight. Selling weapons to terrorists is a dumb way for gun manufacturers to make a buck, but obviously that's all they care about.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-r1uj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1239

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Vanderborg

General Comment

Do not move the export licensing of assault weapons to Commerce. This is a military threat, not a regular business transaction.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-r1om Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1240

Comment on DOS-2017-0046-0001

Submitter Information

Name: emilia novo

General Comment

Dear sirs:

I am appalled by the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the Commerce Department. This basically means that a set of controls to guarantee that American weapons would not end up in terrorists hands will disappear. This change would facilitate firearms exports to oppressive regimes, remove safeguards that help organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. Think of a world where any terrorist bent on destroying the USA was easy access to American weapons. Is this the world you want to create?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-sys7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1241

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Quinet

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business) is the NRAs wildest dream and regular citizens worst nightmare.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-uiex Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1242

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie LAUENSTEIN

General Comment

I oppose this proposed rule for the following reasons:

Once the State Departments Blue Lantern program would be eliminated, the pre-license and post-shipment inspections and publicly reports we desperately need to be informed of, would also be gone.

Removing licensing requirements for brokers bears a great risk of increasing trafficking

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The USA has more firearms than people. What for?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-auer Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1243

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Friedland

Organization: none

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-xocv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1244

Comment on DOS-2017-0046-0001

Submitter Information

Name: Art Hanson

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-40c7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1245

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Benson

General Comment

I strenuously oppose this proposed rule change

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-bbx7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1246

Comment on DOS-2017-0046-0001

Submitter Information

Name: Timothy Beitel

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-zmnu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1247

Comment on DOS-2017-0046-0001

Submitter Information

Name: peggy varnado

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. As a lifelong teacher, I know that we need more STRINGENT gun safety measures. A ploy to make it easier to sell guns and automatic weapons in particular is grotesque in light of the shootings that occur every few days in this country with ridiculously ineffective regulations on guns. How many more people have to die by gunfire to make the regulations tighter not more lax. Please show some courage and integrity and do not put arms regulations in the hands of the very businesses who profit from gun sales. My question is who thinks this is a good idea, who will profit from it, and why can't we get common sense gun laws in place before the next group of students, workers, first graders, movie goers, people walking down the streets of our nation are slaughtered with guns that have no place in civilian hands?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-6n7j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1248

Comment on DOS-2017-0046-0001

Submitter Information

Name: Natasha Hopkins

General Comment

As a constituent concerned with both the security of our nation and the epidemic of gun violence plaguing America, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department for the following reasons:

Firearms exports, at present, are classified as military hence the reason they are under the regulation of the State Department; and the reason Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

In order to ensure the security of our nation and to minimize gun-related tragedies, I urge the U.S. Department of State to abandon the proposed International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-3cym Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1249

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marie L

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-gdq3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1250

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pierre L

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-lusr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1251

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lena H

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-apc2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1252

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-ulhc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1253

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Trump wants to make it easier to export guns. Guns are dangerous; they kill people. There should be more controls, not less.

Therefore, I oppose this rule change that would switch the regulation of firearms export from the US State Department to the US Commerce Department.

The US Commerce Department is ill-equipped to handle the responsibility & the huge process.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-y7o7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1254

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donald Goldhamer

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Firearms are not mere commodities and the Commerce Department is unequipped to properly control their movement.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942w-31me Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1255

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Schroder

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-d6ck Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1256

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jim Weaver

General Comment

We need to limit the spread of weapons of war beyond our borders. This is a national security issue. Corporations seeking to profit from the sale of arms overseas are placing their profits before the American people. This is a clear threat to Americans everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-vamq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1257

Comment on DOS-2017-0046-0001

Submitter Information

Name: J.T. Smith

General Comment

Reality check: Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to far more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-v2ie Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1258

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna Minster, SSJ

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-v37o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1259

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Mastro

General Comment

I oppose the rule change that would allow the Dept. of Commerce to regulate arms shipments.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-boyj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1260

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please keep the regulations on firearms strict and for the safety of citizens. As a matter of fact please tighten up loopholes. Moving the management of guns to another dept. focused on business is a bad move.

Where is the care and concern for citizen's rights, the right to feel safe in school, the right for those who have been physically threatened to be safe?

Let's get real and keep any regulations in place and increase safeguards where they are needed. For instance longer wait times for purchase while a thorough check is done. Stronger actions in response to online or other kinds of threats made regarding shooting. Let's protect our citizens!

Thanks for listening, Mindy

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-klch Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1261

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Cooper

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-jsi4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1262

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Dinowitz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer does almost nothing for the citizen while creating opportunity for industrial profit for the firearms industry and NRA. It also removes Congressional ability to oversee and help regulate fire arms sales.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule change must be opposed and defeated for the safety of all people both in the US and the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-ox0g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1263

Comment on DOS-2017-0046-0001

Submitter Information

Name: Greg Asbed

General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-jf0c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1264

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lee Michelsen

General Comment

I am very concerned with proposed legislation to change the control of exporting firearms from the State Department to the Commerce Department. Some of the deleterious effects would be:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

Most Sincerely

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-c1el Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1265

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marie Pabianova

General Comment

I object to the latest proposal regarding firearms production and export!

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-phaz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1266

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth McCarney

General Comment

I am opposed to changing the way gun sales are regulated . I don't believe the dept .of commerce should be in chat get of selling military weapons throughout the world. I want congress and the American people to be aware of who's buying weapons from us and for what purposes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942x-sp4f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1267

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jose Greco

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-4yox Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1268

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Tyndall

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-fhkh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1269

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tara Poelzing

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The State Department focuses on safeguarding our nation while the Commerce Department focuses primarily on promoting business.

In the case of firearms, safety should come first and foremost. The potential to move more weapons in the hands of additional dangerous people and regimes must be considered and immediately addressed. This is the first and easiest step to avoid that situation. Oppose the rule change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-a25j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1270

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carlos Cunha

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is clear that one of the reasons Mexico is having so many problems is because of the outflow of American firearms to the country. This rule change will facilitate the process in Mexico and other countries leading to more crime and more immigrants fleeing to the US:.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-kj4p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1271

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paula Sjunneson

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-q88q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1272

Comment on DOS-2017-0046-0001

Submitter Information

Name: Wendi Smith

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-vjd3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1273

Comment on DOS-2017-0046-0001

Submitter Information

Name: E Resnik

General Comment

Keep gun sales under the Department of State for the safety of all Anericans

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-xl9k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1274

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gavi Stevens

General Comment

So now the NRA is trying to dictate foreign policy for our government and what to sell overseas. That is just how arrogant they are and how much they think they control this administration and Congress. This overreach by an organization that has grown into one that tries to control governments from the local to the national has to be stopped before they become the puppet master of our country. We can't allow an organization whose sole purpose is to put lethal weapons into the hands of as many people as possible to dictate policy to our leaders. Allowing increased exporting of assault weapons overseas just means that more insurgents will be using those weapons against us, our military forces and our allies forces, causing that many more deaths and injuries. Is that what you want to be known for? Allowing those young men to die or be wounded unnecessarily just to benefit one organization's lust for power? I can only hope not.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-5itt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1275

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Martin-Haynor

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-pcfe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1276

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Kuck

General Comment

I strongly oppose this rule that will transfer the sale of arms from the State Department to the Commerce Department. Having lived in the Caribbean for 23 years, I see how the sale of illegal arms has created instability in these countries. If they can buy more legally, we will have created the violent situations that are causing the flow of immigrants to our country. If they cannot come to us, where will the victims of this violence go?

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

The State Department must continue to oversee the sale of arms, and not remove the restrictions above.

Thank you. Mary Kuck

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-8vue Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1277

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lucy Paschke

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-utp5 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1278

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The NRA is trying to pull another fast one, and we need all engaged and committed gun safety advocates to take the time to read through the details of this alert and take action!

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-ln3h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1279

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah McKee

General Comment

Sales of armaments are special. The only purpose of armaments is to kill people. At least, with State in charge of OKing arms sales abroad, it can nix sales to countries and people likely to kill the wrong people with them. This is in part because State knows who they are. So it has at least a tenuous ability to control arms sales likely to contribute to world destabilization.

Commerce has none of this capacity. It is concerned with profits to American companies, I believe. Well, sales of armaments are profitable -- to the armaments corporations. They of course are far less profitable to the resulting foreign dead.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-gd8o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1280

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jason Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The proposed rule change would make the world a far more dangerous place. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-hu6s Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1281

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The NRA is trying to pull another fast one, and we need all engaged and committed gun safety advocates to take the time to read through the details of this alert and take action!

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-q26h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1282

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Heatherly

General Comment

You want more unregulated weapons to kill men, women and children. You want more unregulated weapons to cause death and destruction? You more more unregulated weapons to destabilize the world? You want more unregulated weapons to make it harder for everyone and encourage terrorism?

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-95ef Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1283

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Boehler

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-evkk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1284

Comment on DOS-2017-0046-0001

Submitter Information

Name: M Hewitt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Do not cave in to gun advocates. Stop the nonsensical proliferation of weapons!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-7cfs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1285

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Loftin

General Comment

SO JUST WHO ARE YOU WORKING FOR THE PEOPLE OF AMERICA OR THE GREEDY NRA
A KNOWN DOMESTIC TERRORIST GROUP WHO CONTINUES TO BRIBE OFFICIALS!!!!
PROVE THAT YOU ACTUALLY HAVE ETHICS, MORALS AND SCRUPLES AND STOP THE
SALES OF THE MACHINES OF WAR, DEATH AND DESTRUCTION!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-7kuf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1286

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sally Archibald

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-ytt0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1287

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jno Hunt

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-vwft Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1288

Comment on DOS-2017-0046-0001

Submitter Information

Name: A Davis

General Comment

I absolutely 100% oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-y7rv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1289

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Hess

General Comment

I oppose changing gun trafficking from the State Department to the Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-8qps Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1290

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I support having the State Department continued control of weapons accountability to foriegn countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-ghcj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1291

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Spring

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-fha9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1292

Comment on DOS-2017-0046-0001

Submitter Information

Name: Meredith Dodson

General Comment

As a parent and taxpayer, I strongly oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-8472 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1293

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tracy Burroughs

General Comment

I am completely opposed to moving control of firearms sake from the Department of State to the Commerce Department. Supplying arms as a purely financial move is to place all decisions in the position of being about making money instead of where it belongs - as a national security risk. This is a terrible idea!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-o7pg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1294

Comment on DOS-2017-0046-0001

Submitter Information

Name: Esther Allman

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-grne Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1295

Comment on DOS-2017-0046-0001

Submitter Information

Name: Felicia Bruce

General Comment

Switching firearms sales from DOS to Commerce is a bad idea . It compromises our national security! Of course the DOS should be aware of gun sales! Selling arms is an act of military concern, not trade! Gangs, terrorists and other nefarious organizations profit from the sale of firearms. To treat it as trade is absurd.
Clearly I oppose this change as any patriot should.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-aifs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1296

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandy Irving

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This will hurt our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-42hd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1297

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Holt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-9h11 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1298

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beverly Conway

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-3qbu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1299

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I had been under the impression that this administration was against foreign terrorists and foreign criminals who could hurt American citizens. Deregulating weapons sales to foreign buyers makes America less safe.

Part of the mess in Afghanistan was because they had weapons we sold them when we were trying to take out the USSR. Then voila, Taliban!

Because we have legal gun ownership in this country, we have a very active market for guns and American-made weaponry is very high quality. Do we really want it to be easy for those weapons to get in the hands of the next Osama bin Laden?

Oh, I see. Obama killed bin Laden, therefore bin Laden must not have been that bad, and we should encourage more terrorists to continue erasing Obama's legacy. Because MAGA means Make America Vulnerable Again, right?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942y-pqtq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1300

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-m0v7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1301

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marjorie Girth

General Comment

I oppose this proposed rule, which would change the management of this program from the Department of State to the Department of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-2lfx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1302

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charity Perry

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-g5d5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1303

Comment on DOS-2017-0046-0001

Submitter Information

Name: Keith Kinder

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-l0ah Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1304

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ron Kardos

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-sw0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1305

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Dipboye

General Comment

I am extremely. extremely opposed to moving oversight of export of weapons from the State Department to the Commerce Department. Given the situation in our own country and the situation in Mexico and Central American countries due to lax regulation on firearms in our country, this is exactly the wrong move in that it would enable the acceleration of gun violence. I strongly urge you to resist this move. We are at a time when more effective regulation on firearms is critical. We are not at a point where making more money on guns could possibly be beneficial to anyone other than the manufacturers. Please resist this change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-uxfm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1306

Comment on DOS-2017-0046-0001

Submitter Information

Name: Denis Graves

General Comment

Changing the oversight of gun sales from the State Deaprtment to the Commerce Department is a very bad idea. It will mean more guns available to potential terrorists etc.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-1jc2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1307

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin O'Donnell

Organization: MomsRising.org

Government Agency Type: Federal

Government Agency: USCIS

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-rkoa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1308

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Do not let the NRA run OUR government for gun manufacturers profit.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-sszq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1309

Comment on DOS-2017-0046-0001

Submitter Information

Name: LeeAnn Chastain

General Comment

I adamantly oppose switching the regulation and exportation of gun sales from the US Department of State to the Department of Commerce. Arming the world with even more guns will only result in greater societal disasters as the criminal elements become even more powerful and use these weapons to control the law-abiding populations of the world.

We would be exporting the means for mass shootings and daily carnage that we have in this country, merely so the NRA could become more powerful and gun manufacturers could reap more profit.

We must not make this change, for our protection here in the United States and for the good of the world.

Please oppose this change and carefully regulate any exportation of guns and ammunition.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-df93 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1310

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Miller

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-242a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1311

Comment on DOS-2017-0046-0001

Submitter Information

Name: Louise Backer

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

The rule change would make the world a far more dangerous place because:

1. It would eliminate the State Departments Blue Lantern program which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms and enable 3D printing of firearms in the U.S. and around the globe.

Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

We dont need more guns in the world or in the United States. We need more oversight to make sure the wrong people dont obtain guns and ammunition.

Why are we helping the US gun industry [NRA] with this proposed change? They should not be the ones to benefit at the incredible expense of innocent peoples safety.

This is morally wrong and unethical. Please do not make the rule change. Do not be beholden to the NRA and the gun industry just because they want to fill their pockets with the profits from the sales. Think of the innocent people who would be impacted adversely.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-1vli Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1312

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beryl Filton

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-p27f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1313

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Roeder

General Comment

I oppose moving the regulation of firearms exports from the State Department to the Commerce Department. Doing so would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents such as organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This change is not in the best interest of our people, or anyone's people.

One detail about the change: the removal of the ban on the 3D-printing of firearms is simply not acceptable.

Please reject this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-mpws Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1314

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Miller

General Comment

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-1ato Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1315

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vic Burton

General Comment

Please consider these points and not approve this rule change:

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-l9jy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1316

Comment on DOS-2017-0046-0001

Submitter Information

Name: Liz Bornstein

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942z-jp7y
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1317

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tennie Caldwell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the US State Department to the US Department of Commerce. Firearm exports are classified as military which is why they are under the regulation of the US State Department so Congress can block large batches of firearms to foreign countries. With the rule change Congress would no longer be automatically notified about sizable weapons sales that it could stop in the name of national security, especially to countries like the Philippines, Turkey, Syria, among others.

The Commerce Department does NOT have the resources to adeequately enforce export controls. Its Bureau of Industry does not have staff everywhere which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerout agents would face far fewer hurdles in order to obtain large quantities of American guns and ammunition.

Changeing this rule would be a very dangerous and irresponsible change to make with regards to weapons!

Sincerely,
Tenne L Caldwell

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-q2rn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1318

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-ve9n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1319

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Beach

General Comment

I am opposed to changing the oversight of international weapon sales from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-5nwf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1320

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alisa Schlacht

General Comment

I am writing to implore you to prevent the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The United States should be a beacon of light for freedom and justice in the world, not a global supplier of weapons to increase brutality and human suffering. The U.S. Commerce Department should not be responsible for spreading murderous weapons around the world, which will undoubtedly end up being used cruelly against innocent people and likely against Americans as well.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-u367 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1321

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debra A.

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-fxej Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1322

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Rincon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-qs8p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1323

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca Zimmerman

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-nsda Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1324

Comment on DOS-2017-0046-0001

Submitter Information

Name: Virginia Smedberg

General Comment

I am writing to object to switching the regulation of firearms exports from the State Department to the Commerce Department. This switch would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-476r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1325

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frederica Huxley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-u4pt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1326

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Creighton

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-6vym Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1327

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Grove

General Comment

I strongly oppose the proposal to switch gun sales from the state department to the commerce department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-2m0f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1328

Comment on DOS-2017-0046-0001

Submitter Information

Name: John J Paulhus

General Comment

Foolish to change the regulation of firearms exports to Commerce. Don't do it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-fp92 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1329

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Weltner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-zsgq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1330

Comment on DOS-2017-0046-0001

Submitter Information

Name: Terrie Stengel

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-lurk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1331

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-1g0j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1332

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This would make the world a far more dangerous place:

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Thanks much.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-m2ah Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1333

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Our family (from Ohio) opposes the proposed rule change to transfer firearms export regulations from the State Department to the Commerce Department. This is unnecessary government fiddling, and dangerous for America. Being driven by business interests (including the NRA and those who profit from arms sales), there is no reason for doing this that would be in the interest of the US or our security -- both national and international. The Commerce Department is ill-equipped to handle arms exports, making the US vulnerable to traffickers, criminals, and terrorists, and poorly or unregulated arms exportation could also lead to instability elsewhere, eventually building negative backlash for our country. (We already see the mass-migration problems formed partly from some of our foreign policies which now we can learn from or anticipate -- this is such a case.) There is simply no reason to make this change (except for profit for a small cadre of people), and many, many reasons not to do so that (which benefit the entire country). In sum, this is reckless and unnecessary, and it would create cost to American taxpayers for infrastructure changes that would be profligate and irresponsible.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-xrlv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1334

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judy Landress

General Comment

I strongly Oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-h88n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1335

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-vz25 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1336

Comment on DOS-2017-0046-0001

Submitter Information

Name: Priscilla Drake

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-yj4i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1337

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Azzoto

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns don;t belong in the hands of just anyone.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-ahup Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1338

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Schulenberg

General Comment

Moving the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-kh4g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1339

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Cumming

General Comment

I oppose this rule change that would switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-yxoo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1340

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laverne Marks

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-bi48 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1341

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marie Snavely

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-dpvw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1342

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lorraine Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please, do not make it easier for guns to be put into the hands of those who may want to do harm to any people.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-49jg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1343

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Logue

General Comment

I oppose the proposed rule change moving the regulation of gun exports from the Dept of State to The Dept of Commerce. This is an issue directly affecting the safety of our country. The mechanism for this regulation needs to remain under the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-nrau Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1344

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Kraus

General Comment

Keep dangerous assault weapons regulations where they are currently and rightfully placed, in the State Department. A rule change will increase drug trafficking!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-nip9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1345

Comment on DOS-2017-0046-0001

Submitter Information

Name: Denise Kline

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department must remain focused on safeguarding our nation while the U.S. Commerce Department should continue promoting American business. This proposed rule change will have profound impact on our national security as well as the security of nations around the world as new avenues are opened for the worldwide sale of arms. We must work to make our nation and the world safer. This proposed rule will only increase danger here and around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-twr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1346

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Kussart

General Comment

I oppose this rule change that would move the regulation of the export of firearms from the State Department to the Commerce Department. These weapons are military weapons and should remain that way. This move would eliminate the State Department's inspection program and public reporting. It would also remove licensing requirements for brokers which would very likely cause more trafficking, and it would remove the State Department's block on 3D printing of firearms. Congress would also have no oversight ability under this move. Therefore, the world would be less safe. I see this rule change as benefiting gun manufacturers only--there is no other benefit to this change. Keep the regulations where they belong--with the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-2aif Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1347

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Isom

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-4lv1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1348

Comment on DOS-2017-0046-0001

Submitter Information

Name: Juanita Payton

General Comment

I oppose the proposed the rule change to move International Traffic in Arms Regulations, from U. S. Department of State to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-79zu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1349

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Painter

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-yr5m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1350

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Yost

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-o414 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1351

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurel Brennan

General Comment

I am opposed to switching the safeguarding of firearms exports from the state department to the commerce department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-wm3u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1352

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Hersh-Heskes

General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department. It would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-9bdh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1353

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dwan Dorman

General Comment

I oppose the rule change to switch regulations of international arms sales from the U.S. State Department to the U.S. Commerce Department. This would be dangerous on many levels.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-km89 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1354

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michele Biggane

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-glua Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1355

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Baum

General Comment

I oppose the proposed rule change that would declassify firearms as military and move the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are weapons, no matter how much organizations may want to call guns sport accessories, and are used to kill people. Moving the regulation of firearms exports from the State Department to the Commerce Department would make firearms exports to dangerous and autocratic regimes easier, remove safeguards that help keep agents like organized crime and terrorist organizations from getting weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms and weapons exports need more controls and export licensing requirements, not less. Government should not sell out to dangerous business interests that work against public safety interests. I Oppose this proposal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-jhuf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1356

Comment on DOS-2017-0046-0001

Submitter Information

Name: DEANNA RICHARDSON

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-gul4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1357

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aaron Sterr

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-wkoi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1358

Comment on DOS-2017-0046-0001

Submitter Information

Name: Chris Kermiet

General Comment

Moving the handling of export licenses of semiautomatic assault weapons and other firearms from the U.S. State Department (to the U.S. Commerce Department is a truly dumb idea. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

This appers to be a move by the gun manufacturers to sell more guns with less oversight. I'm strongly opposed to this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-dm2m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1359

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Johnston

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a dangerous move that would put people who are focused on profits rather than public safety in charge of regulating massively lethal weapons. American arms could (and most likely would) end up in the hands of terrorists, oppressive governments, drug and firearms traffickers, and other organized criminals, undermining national security and global stability. Please dont let this happen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-qs3t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1360

Comment on DOS-2017-0046-0001

Submitter Information

Name: Grady Warren

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-t5n4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1361

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Donisi-Feehan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-0a6h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1362

Comment on DOS-2017-0046-0001

Submitter Information

Name: Victor Sytzko

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-2ha6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1363

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Kute

General Comment

Please keep the strongest regulations on gun sales to all countries.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-dsrt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1364

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frances Lorie

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-k9e6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1365

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexandra Pappano

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-xwf9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1366

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy L Cowger

General Comment

The US of A already sells and permits the sale of far too many weapons without the wholesale marketing opened by allowing the Commerce Department to 'regulate' the trafficking of arms. The very idea is ludicrous!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-3j2e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1367

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julia Bumbaugh-Shah

General Comment

Right now, firearms exports are classified as military. These exports should stay under the regulation of the State Department, so that Congress can block sales of large batches of firearms to foreign countries with serious human rights concerns and be automatically informed about sizable weapons sales that it could stop in the name of national security.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-ik6i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1368

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katy Reddick

General Comment

I oppose any change of regulations that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. These are military grade weapons and must be regulated as such.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-bp9a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1369

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Weissman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Having such exports under the Commerce Department would remove many of the controls which limit massive firearms sales overseas. It would allow 3-D printers to export patterns for firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942z-ese3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1370

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debra whalen

General Comment

firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. This is a dangerous precedence if the rule changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-j8rx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1371

Comment on DOS-2017-0046-0001

Submitter Information

Name: F Corr

General Comment

I believe the State Department should retain regulatory control over the export of munitions. Shifting these munitions sales to Commerce Department oversight will result in these weapons getting into the hands of terrorists.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-cwat Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1372

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Kaufmann

General Comment

I oppose any rule that shifts regulation of munitions exports from the State Department to the Commerce Department. This is a measure that jeopardizes national security for the benefit of munitions manufacturers. There is no reason to do so, other than greed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-6qtn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1373

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Scott

General Comment

Please do the right thing regarding guns for the safety of people everywhere. Keep control of the NRA and DO NOT move them to the Department of Commerce.

Thank you,
Linda Scott

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-405k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1374

Comment on DOS-2017-0046-0001

Submitter Information

Name: GEORGE RODGERS

General Comment

As a global health physician, I can tell you that the rest of the world does NOT need more guns. This move seems to be a rather transparent attempt to increase the export of our huge national problem - too many guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-chdm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1375

Comment on DOS-2017-0046-0001

Submitter Information

Name: Caren Flashner

General Comment

I oppose the rule change that would switch firearms export regulation from the State Department to the Commerce Department. I believe the State Department has more interest in the safety of American citizens than does the Commerce Department, which of course wants to aid businesses in selling as many guns as possible, regardless of to whom.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-spja Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1376

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tamara Prince

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Changing oversight and regulation of firearms would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This is a dangerous move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-pwc1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1377

Comment on DOS-2017-0046-0001

Submitter Information

Name: George Chernetz

General Comment

The NRA is going to push more filthy guns into the hands of people who should not own guns. The NRA is the supplier of domestic terrorism and mentally unstable killers. This epidemic has got to be stopped now.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-vlxl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1378

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Teagardin

General Comment

The American people have made it clear that we are opposed to guns, particularly semi-automatics. Do your job and listen to the will of the people.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-79kd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1379

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Meister

General Comment

I oppose the proposal to switch regulation of exporting firearms from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-z8hh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1380

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Changing the rule regarding arms regulations is the wrong thing to do. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-1j0x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1381

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lorna Wood

General Comment

I oppose this rule change. Moving handling of export licenses for powerful firearms from the State Department to the Commerce Department seems likely to promote arms dealing with few if any limits, which will put our national security and our relationship with our allies at risk. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-wkfw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1382

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Chandler

General Comment

We already have endured many instances in which our firearms were used by foreign nationals to kill our troops. We have also witnessed our firearms being used by terrorists, drug traffickers and extremist regimes to take innocent lives.

Although they haven't done a stellar job of safeguarding our soldiers or civilian populations, the Department of State must maintain control of international firearms sales, and foreign firearms sales must remain classified as "military" ... the Department of Commerce has no resources to even begin to measure the monumental risks involved in weapons export.

No matter how many people support this change, it must not be made.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-v7lk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1383

Comment on DOS-2017-0046-0001

Submitter Information

Name: Matthew Genaze

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Here are more details on how the rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Guns are an epidemic. Guns are a daily act of terrorism. Guns are a direct threat to our democracy. These facts require direct and significant action immediately. I am only able to support legislators and the parties they are members of that support aggressive gun regulation legislation.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-fb9i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1384

Comment on DOS-2017-0046-0001

Submitter Information

Name: Raymond Adams

General Comment

The international sales of guns is not good for the world. It is gun trafficking plain simple. I strongly oppose such a policy.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-dogh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1385

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Berg

General Comment

I understand there is a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

I absolutely oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. In any case their priority is business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-s5ok Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1386

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erika Olson

General Comment

I cannot believe this is even being considered. Guns and firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

If anything we need MORE oversight and controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-n13w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1387

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Phalen

General Comment

Please do not increase access to weapons. The presence of more weapons leads to more violence, or makes suicides more prevalent. Gun ownership needs to be limited as a part of good public health.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-9op6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1388

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alisa Norquist

General Comment

Please do not move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-2zch Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1389

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Shields

General Comment

changing oversight is losing to Putin and his white house puppets

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-54lw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1390

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeremy Spindler

General Comment

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-vw7r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1391

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dustin Weinberger

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

If anything we need additional oversight and this change would drastically weaken oversight.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-3oh5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1392

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Lopez

General Comment

Exports of weapons must remain with the State Department. Munitions exports must also remain with the State Department. These items should not be treated the same as items that have non-violent domestic use.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-ox0s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1393

Comment on DOS-2017-0046-0001

Submitter Information

Name: ronald brown

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-xbt4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1394

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill Bremer

General Comment

Regulation of the sales of assault type guns should stay with the U.S. Dept. of State. These weapons are potential security threats to U.S. citizens and people in other countries. Many of our current Administration's policies and behaviors are antagonizing both our allies and enemies and many would be willing to inflict fear and death.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-ethq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1395

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike McCampbell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-3wp8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1396

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Englert

General Comment

Attention all,

I oppose the Rule Change that would switch the Regulation of Firearms Exports from the State Dept to the Commerce Department. I fear the proliferation of military style weapons through out the world. I believe that more guns in circulation make us less safe.

Please oppose this suggested change.

Sincerely,

Alice Englert

797 Col Edmonds Court

Warrenton Va. 20186

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-k4iq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1397

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Cameron

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The USA has more guns per capita than any other country in the world. We are also the country that has more mass shooting than any other country in the world. Do not allow weapons to become a commodity and spread the USA's blatant disregard for human life to be spread around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-wp2e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1398

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Spykerman

General Comment

The move of handling export licenses from the state department to the commerce department does not even make sense. These remain dangerous weapons and need to be regulated by an agency who has the country's safety as its primary mission, vs. that of an agency that has business profits and the economy as its top priority. Do not move the export licenses of these dangerous weapons away from an agency focused on our country's safety as well as the relationship with allies and other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-g55o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1399

Comment on DOS-2017-0046-0001

Submitter Information

Name: PJ Jacobs

General Comment

I write today to state my opposition to moving the regulation of firearms exports from the State Department to the Commerce Department.

Such change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and contributes to mass migration.

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The State Department has shown itself to be well equipped to perform this strategically important function. Together with Congress, it is in a unique position to thus protect this great nation from harm to national security that can result from large batch firearms sales to foreign countries.

There is nothing broken that could possibly be fixed by the moving the regulation of firearms exports from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-4of9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1400

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Medina

General Comment

We need more regulation of firearms, not less. Do not change the department in charge of regulation of deadly weapons.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms

exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist

organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-ipy3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1401

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Cunningham

General Comment

Removing weapon sales from the purview of the State Department leaves this country in danger. We cannot allow a basically unregulated sale of automatic weapons to anywhere in the world. It may make profit for a few arms dealers and the NRA but it damages the security of this nation by opening the doors and making it easier for criminals to buy and sell guns internationally and for terrorists to get their hands on these weapons to be used against us or other governments. This is literally "shooting ourselves in the foot". BE SMART Say NO to the NRA. We need the State Department to regulate and check when and where and how many weapons are moving and the STATE DEPT. may need more adequate funding than it already has for this. Protect this country for real and not with "patriotic words". Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-31bb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1402

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Scherer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-u6hp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1403

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Ramar

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-tilc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1404

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike Sudalnik

General Comment

To allow the unbridled access to firearms by any country in the world without scrutiny by the State Department would be a measure that would open the floodgates of insurgencies and armed conflicts! This would undermine stability in the world and lead to complications in matters of OUR National Security! A totally FOOLISH REGULATION ! Oppose IT!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-7knu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1405

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Arnold

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-ud31 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1406

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-7t8x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1407

Comment on DOS-2017-0046-0001

Submitter Information

Name: marianne ewing

General Comment

i object to the possibility that guns of all types be sold world wide.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-x77q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1408

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pearl Holloway

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

In addition:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-hm0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1409

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alicia Talerico

General Comment

I oppose the switch of regulating firearms from the U. S. State Department to the U. S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-msau Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1410

Comment on DOS-2017-0046-0001

Submitter Information

Name: Raymond Valinoti, Jr.

General Comment

I received this disturbing message from MomsRising.org in my email. I agree with this organization about this:

"The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business)...] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

"HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries...] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

"Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

"The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration."

PLEASE, for the sake of America and the rest of the world, OPPOSE this rule change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-vr4q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1411

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rita Garvey

General Comment

Firearms are dangerous.

They are being used to kill people every day around the world in acts of organized crime, political violence, terrorism, and random acts of violence.

They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-968q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1412

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Novenski

General Comment

I am strongly opposed to the unbridled commercialization of weapons sales. Our national security must not be bypassed by weapons manufacturers and arms dealers intent on boosting their sales wherever they can find buyers. It is bad enough right now, but removing the last vestige of US Dept of State control means uncontrolled flows of military weapons to the highest bidder.

Profits are not the only factor to consider here. Our national security, and security of our citizens around the world, are at stake. Keep international traffic in arms under the control of the U.S. Department of State.

Sincerely,
Linda Novenski

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-hq5r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1413

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Gelfer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-s2ov Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1414

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Carroll

General Comment

This is extremely unwise. Please block this legislation! We
Need more accountability for fire arms not less! We
Dont want to fund oppressive regimes abroad and the
President has continually praised dictators and taken their
Side: Duarte, Putin, Kim jung Un. Please do not unleash
3D printed guns on the world! Please. Its just not worth it
For the sake of more gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-rum6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1415

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rima Rosenthal

General Comment

I am opposed to the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-iy3w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1416

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Hondrogen

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-ckj7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1417

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurel Facey

General Comment

The State Department needs to continue to control the sale of arms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-rzrt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1418

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kari Pohl

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Don't do it!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-kxds Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1419

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-x6wv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1420

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dorrine Marshall

General Comment

oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-hgkl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1421

Comment on DOS-2017-0046-0001

Submitter Information

Name: q q

General Comment

close the loopholes, make background checks obligatory, ban bump stocks, make our schools safe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-90ou Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1422

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elisabeth Ellenbogen

General Comment

We have rational rules and laws WHO may operate a motor vehicle. There is compelling reason to tighten rules on firearms:
How to purchase, sell, transport lethal weapons is at present not sufficient to keep guns out of the hands of criminals, also
children and adolescents. I may not drive a car because there are valid limits on visual acuity. There is nothing in the law
that requires competency to purchase, own, and carry firearms.

Also we have many regulations or laws governing actions people may take. WHY ARE WEAPONS NOT INCLUDED?

We react to tragedy and crime and then do nothing! Please formulate and pass into law tighter rules who may transport, sell,
store or carry fire arms! Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-w9sc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1423

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Miller

General Comment

STOP SPREADING WEAPONS AROUND the WORLD!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-ppx1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1424

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robin Greeley

General Comment

To the DOS:

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
It would remove licensing requirements for brokers, increasing the risk of trafficking.
It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-b7il Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1425

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Stonaha

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department is not equips to handle large sales of arms. The State Department is better able to properly control the sale of arms, especially to bad actors.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-u79g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1426

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda McNair

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would make it far, far easier for weapons traffickers, terrorists, organized crime syndicates, human rights abusers, and others to get their hands on large amounts of firearms, without oversight or the ability to inspect or stop those shipments by Congress. This regulation change amounts to exporting American levels of gun violence to any country in the world, for any reason. Is there nothing this administration wont sell to the highest bidder, including our own national security? Guns are weapons of war, and they should remain the responsibility of the State Department. Otherwise, with the number of enemies were making throughout the world now, those weapons may mostly end up pointed squarely at us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-7xh1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1427

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Orwicz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-rdyb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1428

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gwen Klemm

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-hggd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1429

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Nodell

General Comment

I oppose a rule change that would switch regulations of firearms exports from the State Dept. to the Commerce Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-5nht Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1430

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Schoenberger

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

How about we don't export out extreme gun violence problem to the rest of the world?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-wnuq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1431

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leslie Silverfine

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-mc4l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1432

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Bray

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce .

We need more Peace through caring about one another..not killing one another.

Jane Bray

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-7dc2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1433

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Do not make this rule change to export weapons to kill more people. If other governments want weapons they can already purchase through existing channels

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-3itc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1434

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tom Emmott

General Comment

The NRA will stop at nothing to increase gun sales and further their morbid perception of the 2nd Amendment. This is pure insanity and our government seems to be willing to take the bait and fall into their web of deception. WHY! Hasn't their been enough violence? Haven't their been enough innocent lives lost, including those of children? We're not living in the 1700's where people had their muscats leaning against the wall next to their front door. The interpretation of the 2nd Amendment has been misconstrued to benefit the NRA and gun owners in this country, and now they want it to include other countries. PLEASE! Don't allow this to happen! Don't fall into their web of lies and deceit!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-8vvc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1435

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Herath

General Comment

I vigorously oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are a threat to everyone. NO ONE needs a semi-automatic assault - NO ONE. The NRS is a biased, confrontational, 'nut-job' group which is not supported by the majority of Americans nor those outside the USA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-4mkh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1436

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Mori

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-d05f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1437

Comment on DOS-2017-0046-0001

Submitter Information

Name: Madelyn Ferguson

General Comment

I am opposed to the rule change of switching the regulations on firearms exporting from from the state Department to the Commerce Department. If this change takes place, Congress would no longer be informed of or be able to block large sales of firearms to foreign countries. I feel this would be a threat to our national security. By putting guns in the hands of terrorists, organized crime, and extremist regimes. Sales of firearms being exported to foreign countries need Congressional oversight. Also the Commerce Department does not have the resources to police these sales, therefore endangering all of us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9430-qvcp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1438

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Kaminsky

General Comment

Control of firearms exports should be in the hands of the US State Dept, NOT the Commerce Dept. The State Dept has the expertise and means to assess security concerns relating to firearms; transferring authority to the Commerce Dept. allows the primary stakeholders -- major gun manufacturers, including companies like Smith and Wesson not even headquartered in the US (!) -- to control export w/o regard for security issues.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-vxsa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1439

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Von Feldt

General Comment

It's bad enough that we've allowed the NRA to destroy the US. We shouldn't allow them to do that to other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-eycy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1440

Comment on DOS-2017-0046-0001

Submitter Information

Name: Trina Sargalski

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

I am also concerned that with the Dept. of Commerce regulating international gun sales that this would remove the State Departments block on the 3D printing of firearms, allowing people like Cody Wilson of Defense Distributed to post online instructions for how to 3D print weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-7kq2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1441

Comment on DOS-2017-0046-0001

Submitter Information

Name: Teresa Batto

General Comment

Gun sales in the U.S. have caused many problems; i.e., increased suicides, mass shootings, domestic violence, etc. Don't allow the rest of the world to suffer our problems, especially with assault weapons. Stop the violence!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-17gg Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1442

Comment on DOS-2017-0046-0001

Submitter Information

Name: Scott Holmes

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-fjes Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1443

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Shepherd

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-pw0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1444

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sari Schimek

General Comment

"There has never been gun violence in the absence of a gun." - Sari Schimek

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-hbqr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1445

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Shepherd

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-xxzy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1446

Comment on DOS-2017-0046-0001

Submitter Information

Name: Howard Winant

General Comment

I am opposed to the ideas that the Commerce Department, rather than the State Department, should control US arms export policy.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-4p76 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1447

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lowell Halpern

General Comment

I OPPOSE the new proposed rule change!!!!!!
Enough is enough!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-xaqx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1448

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

It is past time for this country to STOP bowing down to the GREED AND AVARICE of the gun manufacturers

No more rule changes that can make buying guns even easier

NO MORE GUN PROFITS

NO MORE GUN MANUFACTURER GREED

NO MORE GUNS

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-28s1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1449

Comment on DOS-2017-0046-0001

Submitter Information

Name: MaryAnn Linehan

General Comment

Please be mindful of the intent behind our Second Amendment - do not switch oversight from our State Department to Commerce Department. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-87i9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1450

Comment on DOS-2017-0046-0001

Submitter Information

Name: Regina Blaber

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-6w2b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1451

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gretchen Schiltz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-8h7n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1452

Comment on DOS-2017-0046-0001

Submitter Information

Name: JOHN GLEBS

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

How the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-bpfq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1453

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Coleman

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I can't think of anything more insane than to remove more regulations from gun sales. To provide other countries with weapons that could increase the kind of mass shootings that we have in this country is IMMORAL.
Please do not allow this . We need to provide a safer world, not a more dangerous world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-yyy4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1454

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-iute Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1455

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paige May

Organization: 570

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-kd98 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1456

Comment on DOS-2017-0046-0001

Submitter Information

Name: Trish Weisman

General Comment

I oppose moving responsibility for international arms traffic to the Commerce Department. This is a threat to peace and safety.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-raur Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1457

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fran Mason

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I oppose any and all legislation that EXPANDS the availability of firearms. It is time to formulate solutions that do not use guns and violence as the go-to solution.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-mmyp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1458

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robin Wernicke

General Comment

I am against a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-6bqh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1459

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Evans

General Comment

This is a national security issue. I oppose this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-m3qs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1460

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Thompson

General Comment

I am opposed to the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking by international terrorists and gangs.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-lm0r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1461

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hannah Stanton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-yvxt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1462

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Koelemay, MD

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Furthermore, it would

- eliminate the State Departments Blue Lantern program
- remove licensing requirements for brokers
- remove the State Departments block on the 3D printing of firearms.

Bottom line...this rule change would make the world a far more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-jmm1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1463

Comment on DOS-2017-0046-0001

Submitter Information

Name: Timothy O'Dell

General Comment

DEATH NEVER TAKES A HOLIDAY. THE MERCHANTS OF DEATH, LOOKS LIKE, DON'T EITHER. I'VE HAD ENOUGH; HAVEN'T YOU, SIR?

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-yljs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1464

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-uzjy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1465

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenneshea Allums

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-nmi5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1466

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

See attached file(s)

Attachments

I oppose this rule change that would switch the regulations of firearms export from the U

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Congress must not be prevented from being automatically informed about sizable weapons sales. Congress must be able to stop sizable weapons sales in the name of national security, even and especially to countries where there are serious human rights concerns, such as the Philippines and Turkey. Depriving Congress of this ability to monitor these sales is a terrible, dangerous idea. It would open the door to firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Allowing this country to do such an unconscionable thing is not only unamerican, it would directly contribute to making the world a more dangerous place as well as inviting security breaches here at home.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-p0aw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1467

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hannah Stanton

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-wh4g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1468

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Porter

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not change the rules. Thank you for your consideration

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-eu7s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1469

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

We need to be able to control the sale of "military type" guns. Commerce is ot the correct way. They are only looking at the trade figures and not security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-xbm1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1470

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michele Emmett

General Comment

Changing the rules concerning guns from State Dept to Commerce Dept seems to be misguided. The stated reason is cost savings but I am concerned about oversight. Categorizing guns as military makes sense. We have too many guns getting into the hands of bad actors as it is. Keep guns under the auspices of the State Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-rrmf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1471

Comment on DOS-2017-0046-0001

Submitter Information

Name: Afshin Sadeghi

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-rygo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1472

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donald Di Russo

General Comment

I strongly oppose switching the regulating of firearms export from the State Dept to the Commerce Dept. We must focus on the use & effect of these firearms sales rather than just "all the money that can be made. Whooppee!!!"

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-upez Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1473

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Rockhold

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-bsgk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1474

Comment on DOS-2017-0046-0001

Submitter Information

Name: obie hunt

General Comment

How many deaths have to happen before something is done? Pass some sensible gun laws!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-117v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1475

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Shannon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It serves no other purpose than to increase the number of killing machines throughout the world so the people who make them can profit from the carnage they create.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-w675 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1476

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Schauer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-lq61 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1477

Comment on DOS-2017-0046-0001

Submitter Information

Name: Evan Gull

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-4v40 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1478

Comment on DOS-2017-0046-0001

Submitter Information

Name: Helen Stuehler

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-xe6m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1479

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peggy Kocoras

General Comment

I am writing in opposition to the rule that would move the regulation of firearms export from the US State Department to the US Commerce Department. This change would result in increased weapons both domestically and globally, which would benefit no one except the gun manufacturers, oppressive regimes, terrorists, and criminals. It would eliminate safeguards that are absolutely necessary for having some control over terrorism and oppression. The Trump Administration claims that it wants to eliminate terrorism, but I believe that this change would aid in the opposite result: terrorism in the US and around the world would increase while only terrorists, oppressive regimes, criminals, and gun manufacturers would profit. This is not the direction I would like to see the US, or the world, go.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-vgv2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1480

Comment on DOS-2017-0046-0001

Submitter Information

Name: edmond lacroix

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-s3tc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1481

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Sanchez

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We cannot make it any easier for violent individuals to acquire guns, be it in the US or abroad. Thank you so much for your attention to this extremely serious matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-b4qv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1482

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Slager

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-70rr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1483

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen Sheahan

General Comment

I am writing to vehemently protest changing the rule that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. And, the Commerce Department and its Bureau of Industry and Security just do not have the resources or reach to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration, as well as:

1. Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. Remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Making this change would be immoral and dangerous. Please don't let it happen!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-a01r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1484

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Horowitz

General Comment

The NRA is pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This is an extremely dangerous path to take. It is not the job of the US government to help the NRA and weapons manufacturers enrich themselves. I urge you in the strongest terms to reject this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-30of Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1485

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annie Chang

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-sthm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1486

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Benoit

General Comment

Changing the laws to minimize the regulation of gun sales around the world is morally wrong. Many countries have very strict laws regarding the ownership of firearms by their citizens. Our gun manufacturers and the NRA will benefit exponentially by selling even more firearms to groups and individuals who want to topple governments, suppress voting rights, and the rights of citizens.

The USA has over 38,000 gun related deaths every year. That number represents the easy flow of firearms to criminals and suicides of too many individuals.

As a teacher, I worked with students to settle conflicts through discussions and active listening. Firearms change those dynamics into an I win, you lose mentality.

We owe it to the 68% of our citizens who do not own guns to say, We hear you and you, as well as, other inhabitants of our world need to be safe from gun violence.

Our legislators have a duty to protect everyone in this country through laws that are not bought and paid for by lobbyists and secret money. They need to be written to reflect the safety and concerns of the majority of our population.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-prsv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1487

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Reed

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-nqzd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1488

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brandon Burrell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Here are my reasons why:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2. It would remove licensing requirements for brokers, increasing the risk of trafficking.

3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-quud Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1489

Comment on DOS-2017-0046-0001

Submitter Information

Name: stewart wilber

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. This rule change would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). I am opposed. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-y9ll Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1490

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Dalton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-7wp2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1491

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Ditore

General Comment

International weapons sales are currently handled by the right federal agency, one that takes true national security into account in their decisions. The business class HATES the very idea that governments and government agencies have the power to limit or prohibit any of their narrowly-defined profit-seeking obsessions for any reason, even good or even inarguable ones. Weapons are not just another commodity; they are intended for one purpose only: destruction of human life. This can be allowed, definitely not encouraged, unless there are good reasons for deadly armaments. But the Commerce Dept. cares about none of that. It's just money for them, and they want as much as they can get, by whatever means they can arrange, and somehow they think the chickens will never come home to roost. This has to be handled by an agency with a broader and wiser approach. That's State, not Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-113g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1492

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change for regulation of firearms export from the U.S. State Department to the U.S. Department of Commerce

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-4mt8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1493

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Foster

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Specifically because it would:

1. eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and makes these reports publicly available;
2. remove licensing requirements for brokers, increasing the risk of trafficking; and
3. remove the State Departments block on the 3D printing of firearms.

All of the above controls are necessary to keep the World safer. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-nbzh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1494

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alyce Callison

General Comment

I'm a citizen concerned about this proposed rule change. I believe it would open new floodgates for arms sales internationally, with huge implications for our national security. I am opposed to the fact that this rule change would consider semi-automatic assault rifles as non-military, which makes no sense, as military use is their primary function by design, and that it would eliminate Congressional oversight for important gun export deals, which would limit Congress's ability to comment on related human rights concerns, and remove Congress's proper role. As a taxpayer, it also offends me that this proposed rule change shifts the cost of processing licenses from gun manufacturers to taxpayers. Even at present, the Commerce Department doesn't have the resources to enforce export controls. Please prevent this rule change, which would inevitably lead to increased terrorism and violence globally.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-9v9z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1495

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Grames

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule change is a clear danger to our national security and should not be implemented.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-4xgx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1496

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Charest

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-5af6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1497

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I suspect you already know this is a bullshit move, and bad move, not in the public interest - the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-tbvw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1498

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dorothy Anderson

General Comment

I oppose this rule change. It would be dangerous to allow the US Dept of Commerce to regulate fire arms export. Fire arms are classified as military and should be under the control of the State Dept. As of now Congress can block large sales of firearms to foreign countries. We need to keep State Dept's Blue Lantern program in place since 1940. It would be dangerous to allow 3D printing of firearms which State Dept. now blocks.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-vybj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1499

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allen Chazin

General Comment

Ordinary citizens should be paid as soldiers with the already heavy concentration of weapons to humans!!!! Do Americans really need this barrage of guns!!!! The Dept. of Commerce will only see infringements to business; why not let the U.S. Chamber of Commerce regulate gun flows from abroad. It amounts to same thing.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-wwb1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1500

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-2b7p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1501

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Gentile

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-fky3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1502

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-fnwr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1503

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cathi Rodgers

General Comment

This is a comment of opposition to this rule. Any law that has a net reduction in regulatory burden on guns sales is wrong and dangerous. The NRA supports this for no other reason than more profits for gun manufactures, also know as their base. This rule would make it easier for people of other countries to access weapons of war. We need to stop this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-ou3w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1504

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Janelle Shubert

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and PUBLICALY reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Department's block on the 3D printing of firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-z6vc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1505

Comment on DOS-2017-0046-0001

Submitter Information

Name: J S

General Comment

I strongly oppose this rule change that would switch regulation of firearms exports from the US State Department to the US Commerce Department. For multiple reasons, this change would make it much easier for violent actors worldwide, including criminal and terrorist organizations and repressive regimes, to obtain large quantities of American arms and ammunition and potentially to use US 3D printing technology to make weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-wrdt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1506

Comment on DOS-2017-0046-0001

Submitter Information

Name: Emma Bradshaw

General Comment

Keep international traffic in arms regulations in the U.S. State Department. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-cvwe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1507

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cori Bishop

General Comment

I oppose this rule change. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-4aba Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1508

Comment on DOS-2017-0046-0001

Submitter Information

Name: Matt Peters

General Comment

I oppose this regulation change. We need to make sure firearms are not exported to oppressive regimes and maintain safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-zyyf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1509

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary B

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

If we want to lessen the number of people applying for refugee status, we should be working to make their countries safer, not flooding them with more weapons of war. We should be working to make other countries safer and more stable, not creating more violence and instability by selling them more firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-2rng Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1510

Comment on DOS-2017-0046-0001

Submitter Information

Name: TATYANA WHITE

General Comment

Firearms exports are military and should not be classified as commercial. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Making this change endangers every single person living in this country. I strongly oppose this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-kctl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1511

Comment on DOS-2017-0046-0001

Submitter Information

Name: julia bottom

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-86vt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1512

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurel Gress

General Comment

I am strongly opposed to the National Rifle Association's efforts to move the handling of export licenses from the U.S. State Department to the U.S. Commerce Department, making it easier for U.S. gun manufacturers to sell weaponry to other countries.

The last thing other countries need is for their nations to become lawless, dangerous, gun-happy places for the citizens to live, much like this country has become. The NRA should be labeled a terrorist organization and should be outlawed and shut down. It has become almost as dangerous as the Taliban and Al-Qaida in the Middle East!

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-idwx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1513

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gloria Doan

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-mka3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1514

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-5m2r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1515

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-stdw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1516

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha M. Wilson

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce department for the following reasons.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-i191 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1517

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Gardner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-34fx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1518

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rochelle La Frinere

General Comment

This regulation of firearms export must remain with the State department, not Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-sjdr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1519

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Baird

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-v0am Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1520

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Greenberg

General Comment

I oppose this rule change that would switch regulation of firearms from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-k37z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1521

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maryann Mueller

General Comment

I strongly urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war. Please do what is for the safety of the common good. Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-9hea Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1522

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

For our national and global security, please keep firearm trade regulations within the State Department's jurisdiction. Leaving this matter in the hands of the Commerce Department would only increase the likelihood of weapons falling into the wrong hands.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-k5f0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1523

Comment on DOS-2017-0046-0001

Submitter Information

Name: brian mcdermott

General Comment

Please do NOT move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. If allowed to be exported these weapons can be used against the US and other friendly governments by terrorist and the mentally deranged.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9432-9csr
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1524

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike M

General Comment

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-rwf6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1525

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jen Kropinak

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-2cq1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1526

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna Soodalter-Toman

General Comment

I totally oppose moving the control of selling weapons to foreign countries from the Department of State to the Commerce Department!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-mhfz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1527

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Hershkowitz

General Comment

I oppose this change. The State Dept, which protects US interests around the world, should continue to oversee weapons sales to other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-sdt6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1528

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allison Walters

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-5dzs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1529

Comment on DOS-2017-0046-0001

Submitter Information

Name: Grant Power

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-7kix Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1530

Comment on DOS-2017-0046-0001

Submitter Information

Name: John McAllister

General Comment

I am for the regulation of international firearms to remain with the State Department to better insure the unsafe spread of firearms internationally.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-s7kj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1531

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Rosenbaum

General Comment

I strongly efforts to shift the responsibility for the oversight of the export assault rifles and other guns from the State Departments to the Commerce Department as that will result in the relaxation of rules making it easier for U.S. firearm manufacturers to export assault rifles and other guns with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war. This action would result in the "export" also of our plague of gun violence that exists in our country today! Guns and other deadly weapons are already managing to get our of the US illegally through the lack of background checks at gun shows. We should not make it Legal to sell weapons overseas just to keep sales up for gun manufacturers!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-wael Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1532

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

We need laws that make sure that guns are only in the hands of responsible gun owners. This law does not meet that requirement.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-yyab Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1533

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Ames

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-8rve Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1534

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Klausing

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-taea Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1535

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-45ui Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1536

Comment on DOS-2017-0046-0001

Submitter Information

Name: Emily Munro

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-q9fe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1537

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Crowden

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-kwek Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1538

Comment on DOS-2017-0046-0001

Submitter Information

Name: ARTHUR GOLDFARB

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Exported American arms and ammunition could potentially find their way as the instruments of death to American soldiers, allies, or even tourists. Thus, rules for such exports should never be based on goals of commerce, i.e. Department of Commerce. Exports of firearms must remain under the jurisdiction of State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-ou6c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1539

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Davis

General Comment

I could NOT be more opposed to this absolutely crazy idea. Are you guys nuts? There are too many guns now. Guns don't make you safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-mcpu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1540

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shari Draayer

General Comment

I am writing to you to formally oppose this dangerous rule change switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous; they are intended to be deadly. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. In a sane and just world they would be subject to more controls, not less! Forget making America great again; could we make it sane and just first?!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-plp3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1541

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Cobb

Organization: SEIU

General Comment

I'm opposed to the rule changes for the International Traffic in Arms Regulations because it would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would also remove licensing requirements for brokers, increasing the risk of trafficking.

And it would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-3vz0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1542

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Meisler

General Comment

I oppose switching regulation of sales of firearms from the State Department to the Commerce Department. Do not make this proposed change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-2h5d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1543

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sybil Schlesinger

General Comment

Please do not enact this rule change. This proposed rule change eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

There are enough weapons in the world now. We do not need to enrich gun manufacturers at the expense of all the rest of humanity. Do not change this rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-rotz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1544

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rev. John Fernandes

General Comment

We do not need more guns around the world. Some of the anticipated customers are not friendly toward the United States.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-m5bh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1545

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judithe Norman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U. S.State Department to the

U.S. Commerce Department. This is another example of the power the NRA has over our elected officials whose job

is to keep our country safe not to pander to the NRA. Do your job!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-pfyx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1546

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda OConnor

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-5e9b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1547

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Fardig

General Comment

I am a retired nurse-midwife, very concerned about the public health impacts in the U.S. and globally of too many guns in the hands of dangerous people. Let's not export our lethal problem to other countries.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migrations.

Keep the regulation in the State Department with stronger safeguards and a history of trained personnel to enforce them.

The N.R.A. is becoming a toxic brand so they are looking to develop a new money stream for U.S. guns and ammunition manufacturers. Do not be cowed by their pressure.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-y5oo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1548

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheila Brooks

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-fist Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1549

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Curtin

General Comment

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-4w58 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1550

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary McLees-Lane

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-8k03 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1551

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Mundorf

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-tf03 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1552

Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Tobias

Organization: Philip Tobias Enterprises (and various clients or other companies)

General Comment

Please reject the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms have caused the deaths of several people I knew, in several different incidents. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Switching regulation of gun exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration, such as our country is currently experiencing on our southern border.

To protect human safety and societal stability, please reject this rule change.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-ygyy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1553

Comment on DOS-2017-0046-0001

Submitter Information

Name: Al Mendelsohn

General Comment

The weapons rule change could make the world more dangerous.

For starters, it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Don't do it!

It would remove licensing requirements for brokers, increasing the risk of illegal trafficking.

Don't do it!

It would remove the State Departments block on the 3D printing of firearms.

Don't do it!

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon.

The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Don't do it!

We are watching.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-4t0b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1554

Comment on DOS-2017-0046-0001

Submitter Information

Name: John McArthur

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-dqag Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1555

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Allen

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. In this age of international terrorism, it is crucial that we have stringent oversight of arms sales to overseas (as well as domestic) entities. The mission of the Department of Commerce is commerce, not safety or security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-ivh0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1556

Comment on DOS-2017-0046-0001

Submitter Information

Name: Belinda Lang

General Comment

I strongly oppose the rule that would take the handling of export licenses for semiautomatic assault weapons from the State Department and give it to the Commerce Department. The State Department protects our country while the Commerce Department promotes businesses. People's safety and well-being should be placed before profits.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-o9nx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1557

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ruth Boroshok

General Comment

Why can't we promote PEACE rather than more opportunity for violence!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-d722 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1558

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aaron Ucko

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-hufi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1559

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Ayres

General Comment

I would certainly be opposed to this change. Any exporting of guns should remain under the oversight of the State Dept.

I think just as a national security we would want that. Once they are not watching anymore, who knows how many guns would exit this country and where would they be going to?

We might easily be responsible for killing our own, fighting rebels and terrorist that would be able to exploit this change.

This is just less regulation on a gun problem we already have and should not be changed.

Just say no.

thank you

Peter Ayres

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-g335 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1560

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynn Mignola

General Comment

I oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. A rule change like this would increase the likelihood of large weapons caches getting into the hands of violent and dangerous agents and decrease safeguards for American Citizens. Arms sales are not about commerce and should not be treated as such.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-nmwf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1561

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Licht

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-jwvf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1562

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jo Ann McGreevy

General Comment

This is simply so undeniably WRONG and DANGEROUS! Why does the United States have far, far more deaths from guns than virtually all other countries combined? We must NOT allow the gun industry to "control" us!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-8drg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1563

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roger Chambers

General Comment

For the following reasons, this rule would make the world a far more dangerous place.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would also remove licensing requirements for brokers, increasing the risk of trafficking.

It would also remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-p4uo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1564

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Larson

General Comment

The sale of guns effects our national security. These sales can go to terrorists around the world. The ability to sell weapons should remain with the state department that is much better equipped to vet where and to who they go to

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-2g35 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1565

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Davis

General Comment

Changing gun regulation:

Relaxing the gun rules to make it easier to export and obtain guns is crazy. We need tighter gun regulation to make it harder for the crooks of this country to obtain one. Just look at the deaths guns in this country are causing...no brainer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-ar2j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1566

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pauline Alama

General Comment

I oppose this rule change, which would transfer the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. I don't want my country to be the arms dealer to the world. What the world needs now is not more guns. More guns going around the world, possibly getting in the hands of terrorists, do not make our country or our world safer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-3xmr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1567

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tracy Artley

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-mvmd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1568

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bryan Dunphy

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department for the following reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-q180 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1569

Comment on DOS-2017-0046-0001

Submitter Information

Name: Evelyn Hutt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the proposed rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would also eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-v6a0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1570

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn McKinney

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-sg0o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1571

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joan Farber

General Comment

I am writing because I am opposed to the proposed change in regulation concerning the export of firearms which would seriously increase the dangers to this country . These are my concerns:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

I hope you will take these issues into consideration and not make changes which can so dangerously impact national security.

Yours truly,
Joan C. Farber, Ph.D.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-p98q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1572

Comment on DOS-2017-0046-0001

Submitter Information

Name: LORI BUNTON

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This new regulation is wrong and dangerous not only for U.S. national security but for global security as we know that the greed of firearm manufacturers will surely trump their aversion to selling arms to dangerous countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-wnyo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1573

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-17th Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1574

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gania Barlow

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The rule change would make the world a far more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-b7nh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1575

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Boyce

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-v6n7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1576

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-hahs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1577

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-cihb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1578

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ashley Koger

General Comment

We need to regulate weapons that could threaten the safety of our country and others. Allowing the US to sell guns to any foreign country, regardless of stability and human-rights track record, is reckless and short-sighted.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-jt6w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1579

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sylvia Hopkins

General Comment

If the NRA is permitted to take themselves out of the arena of the USDS, it will become the purveyor of death worldwide. The US already is exerting a terrible pressure on human life with the pressure of its military in so very many countries. The NRA sales would further undermine the sovereignty and health of these nations.

Please make me proud again, to be a citizen (my ancestors were early immigrants to this new world) of the USA. Do not let the NRA have its way in this.

My great grandfather, an immigrant from Nauborn, Prussia, was conscripted into the Union Army of the Civil War. He died of disease in that war, leaving his immigrant wife a widow and his four small children fatherless. He had come to this country to find food, escape militarism and killing.

There is no reason to allow the NRA to place weaponsso easily into the hands of human beings in other countries where people long for a good life. It would be the exporting of a culture of death that we have allowed to grow here. This culture shocks me daily.

Sincerely,
Sylvia Hopkins

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-3ffv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1580

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Murphy

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would make it easier for the export of firearms to oppressive regimes; it would remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons; it would increase the kind of violence that destabilizes countries and causes mass migration, which is already occurring at alarming rates due to wars, and criminal gang activity.

The rule change would eliminate the State Departments Blue Lantern program, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. This would be devastating to civilian populations.

The rule change would remove: (1) the licensing requirements for brokers, expanding the risk of trafficking; (2) the blocking ability of the State Department on the 3D printing of firearms. Without this capability, the State Department would lose an important tool for charging individuals, who use 3D printers to print firearms, with violating arms export laws. The rule switch would remove this block, and expose civilians everywhere to an exponentially larger risk of dying from the expanded use of these lethal weapons.

Please do NOT make this rule change, which will endanger innocent people's lives worldwide.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-9hkb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1581

Comment on DOS-2017-0046-0001

Submitter Information

Name: Douglas Godfrey

General Comment

I oppose this or any other rule change that would transfer authority to grant licenses for the export of firearms from the U.S. State Department to the U.S. Commerce Department.

Firearms in international trade are used as weapons of war. Neither the US State Department, nor the US Commerce Department should not be in the business of promoting War.

The United States should not be exporting our problems with automatic and semi-automatic weapons to the rest of the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-oeax Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1582

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Anonymous

General Comment

As a concerned American and member of the world's human race, I urge you to do whatever is necessary to keep control of the international sale of American firearms. To move it to the Commerce Department flips the focus from safety and peace to making money, and we all know that with money as a motivator, it's much easier for deals to be made that may not be in our country's best interests.

Thank you for standing up for humanity rather than for money-making.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-zgmg Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1583

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelly Orringer MD

General Comment

I am writing to express my STRONG OPPOSITION to this plan.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Submit comments now to the State Department and the Commerce Department opposing the rule change.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-1p1i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1584

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Winkler

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-uc9y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1585

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lyn Bober

General Comment

I am very concerned about this issue. I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The safety of our country AND the world depends upon keeping these regulations under your governance. Thank you for your consideration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-4urk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1586

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Faust

General Comment

There is no reason to allow any change in the sale and export of weapons . To do so would open the door to more violence and death in this world and even less regulation of semiautomatic weapons. Don't let the NRA get away with this dangerous change in it's business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-ym24 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1587

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Siems

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-edt1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1588

Comment on DOS-2017-0046-0001

Submitter Information

Name: PJ Clark

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-vn84 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1589

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Posner

General Comment

To Whom It Concerns:

I oppose this rule switching the responsibility for regulatory oversight of firearms exports from the U.S. State Department to the U.S. Commerce Department. Diplomacy not weapons should be our chief export.

Imagine if that were so: if we retained credibility to solve through diplomacy conflicts around the world. Not only have we been ceding that ground, but now will we increase our presence through even more weaponry? Is my beloved country becoming an evil empire? Please, please, please do not allow this change!

Patriotically yours,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-10kj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1590

Comment on DOS-2017-0046-0001

Submitter Information

Name: Timothy Bailey

General Comment

I strongly oppose this rule change that would switch the regulation of firearms export from U.S. Department of State to U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-tw8g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1591

Comment on DOS-2017-0046-0001

Submitter Information

Name: Victoria DeSarno

General Comment

I oppose the rule change that would switch control of weapons from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-zfi7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1592

Comment on DOS-2017-0046-0001

Submitter Information

Name: CYNTHIA DZENDZEL

General Comment

Please do not allow the transfer of firearms regulation from the State Department to the Commerce Department. Firearms sales to foreign countries should be tightly regulated to avoid the proliferation of dangerous weapons to countries and individuals that may use them against us or other innocents. Please prevent the export of American violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-h1jr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1593

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Kudless

General Comment

I oppose this rule change that would switchgun regulations from the state sept. To the commerce department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-sgec Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1594

Comment on DOS-2017-0046-0001

Submitter Information

Name: christine maciel

General Comment

No, do not switch the regulation of firearm exports from the STATE DEPARTMENT. This is too important to be considered merely 'commerce', it involves who gets guns and what they are to be used for. We must support diplomacy over wars!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-15xc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1595

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Heid

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would make the world a far more dangerous place:

--It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

--It would remove licensing requirements for brokers, increasing the risk of trafficking.\

--It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-yn1d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1596

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stanley Thompson

General Comment

I am opposed this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organised crime and terrorist organisations from obtaining weapons, and further fuel violence that destabilises countries and causes mass migration.

How else would the rule change would make the world a far more dangerous place?

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please block this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-itsn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1597

Comment on DOS-2017-0046-0001

Submitter Information

Name: Therese Wilson

General Comment

I strongly oppose the rule change that would move the handling of export licenses of semiautomatic weapons and other weapons from the U.S.State Department to the Commerce Department.

This rule change would seriously undercut or even eliminate congressional oversight of weapons sales or shipments.

This is totally unacceptable!

The ability of our representatives to stop the sale of large numbers of dangerous weapons to countries who are known abusers of human rights is an absolute necessity!

This rule change would TRULY endanger our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-pbdu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1598

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judy Kameon

General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-icfi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1599

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill Berkowitz-Berliner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-fi6u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1600

Comment on DOS-2017-0046-0001

Submitter Information

Name: E. Luckring

General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I believe firearms exports should stay under the regulation of the State Department and that Congress should have the power to block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it might see reason to stop in the name of national security, or to prohibit sales to countries where there are serious human rights concerns.

Moreover, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This proposed change would make our country less safe by fueling terrorism and organized crime around the world.

Please keep firearms exports under the regulation of the State Department.

Thank You,

Eve Luckring
3641 Lavell Drive
Los Angeles, CA 90065

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-qwy0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1601

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shea Najafi

General Comment

I oppose

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-gssk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1602

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rosalie Riegle

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-rx13 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1603

Comment on DOS-2017-0046-0001

Submitter Information

Name: beth Fischer

General Comment

I STRONGLY oppose the rule change on firearms!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-5dd5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1604

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Toner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need the the U.S. State Department to make the determination. Not weapons salesman making such a determination. Would you buy a home security system from a non-vetted burglar???

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-4nrq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1605

Comment on DOS-2017-0046-0001

Submitter Information

Name: alena jorgensen

General Comment

Are you all nuts? You want to make it easier for our enemies to buy Guns? You really are on a mission to decrease the surplus population. Not just here in the US, but all over the world. KARMA!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9432-vbjf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1606

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marge Schwartz

General Comment

The Commerce Dept. should not be in control of gun sales especially to foreign countries. Guns should remain in the jurisdiction of the State Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-1ve9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1607

Comment on DOS-2017-0046-0001

Submitter Information

Name: karyn barry

General Comment

I strongly oppose switching the regulation of firearm exports from the State Department to the Commerce Department!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We need FEWER guns in the world, not MORE!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-8zm7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1608

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Forbes

General Comment

The words below, taken from Defense News dot com, echo my own views on this matter. Please take these words under consideration.

There are five key dangers of shifting oversight of firearms exports to the Commerce Department.

First, there is an increased risk of exports to unauthorized end users and conflict zones. Under the Commerce Department system, companies can generally use several broad license exemptions to export military equipment without U.S. government approval. When the U.S. government shifts oversight of firearms exports to companies, it loses the ability to identify key warning signs, including risky middlemen, unusual routes and mismatched weapons systems, of a possible diversion of U.S. guns to terrorists, criminals or conflict zones. Without U.S. oversight, the government also couldnt stop the sale of firearms to foreign security force units accused of serious human rights violations or corruption.

Second, a shift to the Commerce Department could compromise the United States ability to investigate and prosecute arms smugglers. The Trump administrations proposal would likely eliminate the current requirement that individuals receive government approval before attempting to broker a deal to non-NATO countries for firearms controlled by the Commerce Department. The proposal might also remove the requirement that companies first register with the U.S. government before engaging in arms exports, which U.S. law enforcement has used to build investigations against illegal arms traffickers. Furthermore, the proposal could create greater legal ambiguity about restrictions on firearms exports and, thus, impede U.S. law enforcements efforts to prosecute cases of illegal arms trafficking. Indeed, if an arms exporter can show that a reasonable person would be confused by U.S. regulations, the illegal exporter could escape prosecution.

Third, the proposal risks losing key legal restrictions on dangerous arms transfers. Commerce Department regulations, unlike the State Departments, are not tied to all federal laws that regulate security assistance, including the commercial export of defense articles to foreign governments that support terrorism, violate internationally recognized human rights norms or interfere with humanitarian operations as well as country-specific controls imposed on nations of concern, such as China. A shift to

the Commerce Department would likely complicate, if not end, State Department reviews of a recipient's human rights violations, as the State Department bureau in charge of human rights may face greater difficulties in pressing for restraint on risky firearms exports. Such a shift would thereby dilute the State Departments ability to prevent high-risk transfers.

Fourth, the Trump proposal risks eroding global norms on firearms exports. Over the past two decades, through bilateral and multilateral agreements, the United States has successfully encouraged governments around the world to adopt better laws and policies to stop irresponsible and illegal arms transfers. Many of these agreements note the need to review export licenses on a case-by-case basis, highlight the importance of brokering registration and licensing and contain other key controls. If the United States decides to reduce or remove some of these controls, many other countries may choose to do so as well, particularly if it allows them to better compete with the United States.

Finally, a shift would likely result in less transparency in arms sales. The proposal could eliminate both Congresss and the publics view of U.S. firearms sales authorizations and deliveries around the world because the Commerce Departments annual reports cover only about 20 countries. Furthermore, there are no public end-use reports on arms exports authorized by the Commerce Department such as those for exports authorized by the State Department. The reports are useful to identify key trafficking patterns that can help avoid risky arms transfers.

Sincerely,

David Forbes

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-a5g9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1609

Comment on DOS-2017-0046-0001

Submitter Information

Name: Denise Pettit

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-1r4x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1610

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Hughes

General Comment

Changing this regulation would make it easier for terrorists and oppressive regimes to get firearms. This will lead to more killings and fear around the world with the result of more people fleeing their country. Why do we need to arm the entire world? It just benefits the gun makers and the NRA!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-e0sg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1611

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Anderton

General Comment

As a defense industry supporter, I support the movement of Category III small arms ammunition regulation from the State Department to the Commerce Department Control List of the Bureau of Industry and Security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-qzls Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1612

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Melloh

Organization: maine psr

General Comment

Please act responsibly. Protect innocent children and others from ruthless slaughter with weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ogcf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1613

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am very much opposed to a rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking the changes in this rule seriously and considering the safety of the citizens and not the profits of the firearms industry.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-jo4x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1614

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeffrey Kleiner

General Comment

Dear Sir or Madam,

I am writing to protest the proposed transfer of gun sales and supervision of the overseas sales of guns from the State Department to the Commerce Department. With the amount of gun violence piling up in the USA, the last thing necessary is more liberal treatment of gun sales. Gun manufacturers and sales considerations should remain under the control of congress with State department oversight.

J B Kleiner, MD

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-tdzw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1615

Comment on DOS-2017-0046-0001

Submitter Information

Name: JANICE MOLAND

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I oppose this change. Thank you for taking action to help make our families, loved ones, our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-702n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1616

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gerritt and Elizabeth Baker-Smith

General Comment

We have learned that the NRA and gun manufacturers are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

We oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place for these reasons, among others:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

All of which leads us to urge that this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department
be OPPOSED!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-i8gu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1617

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Feldman

General Comment

I OPPOSE SWITCHING FIREARMS REGULATIONS TO US COMMERCE DEPARTMENT!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the glob

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ddo9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1618

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Anonymous

General Comment

Don't transfer authority for reviewing export licenses of semiautomatic assault weapons and other powerful firearms to the Commerce Department. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-mvkv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1619

Comment on DOS-2017-0046-0001

Submitter Information

Name: Greg Hamby

General Comment

Greetings, I am opposed to having the Commerce Department oversee Gun Exports from the United States. This mistaken proposal by the Gun Lobby could put more guns in the hands of terrorists. The State Department needs to remain in charge of Gun Exports to make sure weapons do not end up in the wrong hands and places.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-tw5u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1620

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine Fidance

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-jj4t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1621

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Horejsi

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-4yzl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1622

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Chismar

General Comment

A rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business) would open new floodgates for arms sales internationally, with serious implications for our national security. This is NOT acceptable.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-o3a5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1623

Comment on DOS-2017-0046-0001

Submitter Information

Name: Denise Lytle

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-km4a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1624

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomasin Willard

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please leave these regulations under the authority of the State Department - the proposed change benefits the NRA and arms profiteers, and no one else.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-1tda Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1625

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ursula Cohrs

General Comment

I m writing because I am against moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department which is focused on safeguarding our nation, to the U.S. Commerce Department which is focused on promoting American business.

This transfer of authority would open floodgates for arms sales internationally, with serious implications for our national security.

- It would eliminate the State Departments Blue Lantern program (in place since 1940) which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would also remove licensing requirements for brokers, increasing the risk of trafficking.
- And it would remove the State Departments block on the 3D printing of firearms.

As an example to the last comment: When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We all know that firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

This is why fireamrs should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-o3b1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1626

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Goldstein

General Comment

This change will further the danger to the citizen by favoring a business profit over human life -I emlore you please don't sell the lives of our children and ourselves . M Goldsten.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-erzt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1627

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frances Bennett

General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department. There are safety measures in place that would require licenses that are meant to keep arms transfers, including the blocking of 3D printing of arms, carefully monitored. KEEP THESE RULES IN PLACE AND UNDER THE STATE DEPT.

Commerce does not have the resources in personnel to oversee and keep arms from ending up in the hands of terrorists, arms traffickers and other dangerous entities. Our nation is safer with arms sales being under the State Dept. The safety of our nation is more critical than profits.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-7z56 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1628

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Kerbel

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-w8zb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1629

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Klein

General Comment

I strongly Oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place.

Common sense gun safety measures, like numerous other issues (climate change, food labeling, immigration reform, prison reform, education reform, short-term lending regulation, healthcare reform, banking regulation, opioid regulation) remains a vexing problem primarily due to corporations' ability to curry favor with elected officials. The corrupting influence of money in our political system is undermining our democratic traditions and discouraging Americans from voting and/or running for office. This ominous development may well end our experiment in representative democracy unless we alter this decades-long trend. For the sake of the republic, we must amend the US Constitution to state that corporations are not people (and do not have constitutional rights) and money is not speech (and thus can be regulated by state and/or federal campaign finance laws). Short of accomplishing this, no other reform of significance will be achieved. The moneyed interests will turn any reform to their benefit, often at the expense of the nation as a whole.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-d6je Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1630

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cindy Ware

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U>S> State Department to the U>S> Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-72pb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1631

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dominica LoBianco

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ktff Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1632

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Ross

General Comment

To Whom It May Concern,

I am extremely concerned about the proposed changes in the regulations for guns.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

We need safe and thoughtful gun regulations...not exporting guns for a less secure and stable world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-k2pl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1633

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Rymsha

General Comment

I oppose the transfer of gun regulations from the state dept to the commerce dept

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-lk0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1634

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Smith

General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ab9h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1635

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ccnh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1636

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Williams

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-z86b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1637

Comment on DOS-2017-0046-0001

Submitter Information

Name: Damon Mills

General Comment

I am against this change that would move regulations to export firearms to the department of commerce rather than the state department, the state department should continue to regulate export of firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-pqkt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1638

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Cohen

General Comment

This is just another way for gun manufacturers to make more money and has nothing to do with people's rights. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-j6zp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1639

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzy Clarkson Holstein

General Comment

I oppose the rule change which would put international fire arms sales under the jurisdiction of the Commerce Department. In an era when we are concerned about terrorism and weapons availability, it seems very wrong to move gun sales into a sphere where profit would be the chief concern and not national security. Please keep arms sales under the oversight of Defense.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-xv0b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1640

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vicki Linkin

General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-q6oz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1641

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Korengel

General Comment

Please do not transfer the responsibilities for gun exports outside the US from the US State Department to the US Commerce Department.

Individual company's goals are to increase sales and dividends for shareholder, not worry if they are selling deadly weapons to terrorist nations and organizations.

The US State Department is much better equipped to process and regulate the export of semi-automatic guns and all lethal weapons than the US Commerce Department.

Keep American's safe now and in the future. We do not want to be fighting terrorist groups that use US made guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-p7sw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1642

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frank Wissler

Organization: 695 Hillcrest Trl

General Comment

Another step in reducing the security of our nation in the narrow interests of padding the bottom line of manufacturers. Just one more step to fascism.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-82st Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1643

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexandra Walter

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-p5dp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1644

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrea Zinn

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-n7he Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1645

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Krist

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The US SHOULD NOT BE EXPORTING MILITARY WEAPONS!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-2by0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1646

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janie Horowitz

General Comment

I guess, not enough people have died to be a sufficient amount to Warrant gun control! Shame on you!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-fr7i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1647

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Livingston

General Comment

Keep firearms classified as "military" to keep Americans safe. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-7roa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1648

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Sears

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-2i9e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1649

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brad Johnson

General Comment

This is horrible. The consequences of this will be dire.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-16ze Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1650

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Copenhaver

General Comment

I oppose this rule change that would switch the regulations for firearms export from the U.S. State Department to the U.S. Commerce Department. This is a question of national security, as Commerce lacks the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere, which means firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-s7yw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1651

Comment on DOS-2017-0046-0001

Submitter Information

Name: michael pyle

General Comment

I vehemently oppose this rule and will vote against "Anyone" who votes for it. We have enough issues with what's already in place regarding assault weapons. This rule is disgusting.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-w9md Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1652

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ruth Neifeld

General Comment

I am writing to express my opposition to the proposed regulatory change that would move firearm exports from the U.S. State Department to the Commerce Department. Munitions sales should be more closely monitored, not less so.
Thank you for your consideration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-f2gc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1653

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl Ritch

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not believe that this change is in the best interest of the people in our country or the people in the world at large.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-t3q1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1654

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine Bartel

General Comment

The last thing we need is to supply arms to foreign nations. All this talk about securing our borders is meaningless when arms are made available to anyone anywhere. ISIS already loves coming here to restock their arsenals--this would make even travel unnecessary to them. The NRA cares only about making money, not about freedom, democracy or security. The U.S. Department of State is the proper place to decide where weapons can safely be shared.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-45t8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1655

Comment on DOS-2017-0046-0001

Submitter Information

Name: Reed Floarea

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-d2pw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1656

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sabrina Sutliff-Gross

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-hmp7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1657

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dan Esposito

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-fl11 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1658

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shannon Shea

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress needs to be able to know about large-scale sales of arms in other countries, especially to countries with major human rights abuses. Changing the current rule could pose major risks to national security and human rights worldwide.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ypzf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1659

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kim Kensler-Prager

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need gun safety in our country not pandering to the NRA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-11fz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1660

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marion Tidwell

General Comment

I strongly oppose this rule change. Export of weapons should not be overseen by a body with self interest at stake. it should be a matter of national interest.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-obl Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1661

Comment on DOS-2017-0046-0001

Submitter Information

Name: John W. Bova

General Comment

This rule change is not needed and in fact is a dangerous move only meant to sell more guns to more unstable people!

Please don't let this go through, the world is dangerous enough now!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-7f6f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1662

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Holm

General Comment

I am writing in opposition to the commercialization of guns. We have seen the devastating impact of commercialization in the US. I am adamantly opposed to exporting this deadly policy to other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-9xe1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1663

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Edney

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

None of this will make US citizens safer from gun violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-go1p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1664

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Fink

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-vkfa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1665

Comment on DOS-2017-0046-0001

Submitter Information

Name: Greg Nicholas

General Comment

As a VN veteran, I believe there should be no weakening of arms sales. There are to many everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-dh4o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1666

Comment on DOS-2017-0046-0001

Submitter Information

Name: Greg Gaucher

General Comment

My point of view is that there should not be any changes to control over international sales of weapons of death. The state department has done an admiral job of protecting our interests world wide.

The transfer of these responsibilities to the commerce department might vacillate exporting of more death around the world. In effect we would be making it easier to provide the means to create more death

some of that death will be the death of more Americans and that is certainly not we want nor is it what we want to be known for.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-qhyr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1667

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would also remove the State Departments block on the 3D printing of firearms. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ag39 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1668

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eileen Prefontaine

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-kqy9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1669

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Samuels

General Comment

There is too much arms traffic right now. The world need less, not more arms being sent out. Stop this change to make it easier for big business to make more money while setting up more threats to to us and others around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-o5w1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1670

Comment on DOS-2017-0046-0001

Submitter Information

Name: R. Gray

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-1t3o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1671

Comment on DOS-2017-0046-0001

Submitter Information

Name: FRANCIS DANCE

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-64i3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1672

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eileen Donnelly

General Comment

No more guns . We need stricter regulations rather than less

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-59wu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1673

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Winston

General Comment

I'm a teacher. I was teaching 30 minutes away from Newtown, CT when the Sandy Hook massacre occurred. I had students who knew murdered first graders. There was an active shooter situation near a college campus 30 minutes from my current house this week in which a New York State Trooper was killed. The gun violence in this country needs to be reigned in. In the interests of National Security, arms regulations must be regulated by a department interested in national security, NOT commerce. Please, we are failing to protect our citizens from firearms badly enough as it is.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-1193 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1674

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Hanlon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-uty5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1675

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Tubbs

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-oram Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1676

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katie Berkowitz

General Comment

Guns are more than a commodity. We need to be careful about selling them to people who might be enemies tomorrow. There should be much more care shown in selling these types of things. Do not move this to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-ji06 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1677

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beverly Railsback

General Comment

I oppose this rule change which would switch the regulation of firearms exports from the US State Department to the US Department of Commerce. This would remove any congressional oversight of firearms exports and potentially allowing exports to dangerous foreign parties.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9433-jn1p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1678

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Unger

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9434-ig57
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1679

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.
4. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

This change would only serve two purposes: to further the NRA's agenda to enrich the gun industry, and to further Putin's plan to destabilize the world!

There is NO sane reason for making this change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-7m04 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1680

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Watson

General Comment

Stop caving to the NRA Bull Shit.

Look at Australia and how they have dramatically reduced Gun Violence. More Guns DO NOT MAKE US SAFER !!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-jxo1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1681

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Palla

General Comment

THE NRA IS A TERRORIST ORGANIZATION THAT COLLUDED WITH THE RUSSIANS IN 2016. DO NOT GIVE THESE TRAITORS ANYTHING THEY WANT!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-wsev Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1682

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jan and Mike Mahaffey

General Comment

We most definitely oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is only in the best interest of the NRA. How much power is enough? We need gun control legislation to support the safety of our children, families and law abiding citizens! Lets use some common sense!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-ejn9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1683

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheila Wentzel

General Comment

To change fire arms sales from the Dept. of State to the Dept. of Commerce is to place the security of the United States at risk. It places all Americans at risk from foreign entities who would be able to purchase military grade weapons at will and use them against us. Do not let this happen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-68v0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1684

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Kjono

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-qrw1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1685

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lily Lau-Enright

General Comment

I oppose in the strongest voice this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Our world is already in an unsafe and perilous state with rampant uncontrolled gun violence here and abroad. Allow the State Dept to continue its authority to oversee the sale and transfer of firearms. Do not transfer this authority to the Dept of Commerce that has no experience with national security and does not have adequate staff to enforce these new functions. This rule change would hugely threaten the safety and security of our own country as well as internationally.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-7agn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1686

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine Slawinski

General Comment

I want you to know I oppose this rule change, which would allow the U.S. Commerce Department to regulate firearms exports, taking it away from the U.S. State Department. This opens the way for promotion of licensing semiautomatic assault weapons and other powerful firearms, rather than their regulation. This must not happen!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-z1p6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1687

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marian Gamble

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-pkw6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1688

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Stromberg

General Comment

Moving regulations on firearms from the State Dept. to the Commerce Dept. would increase violence around the world. It would be too easy for large quantities of weapons to be exported to dictatorships, terrorists, and organized crime.

Keep the current regulations in the State Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-mbyp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1689

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Rogers

General Comment

Quit selling. military weapons all over the world . We will never have peace that way.
I feel sorry for those who think this is the only way to earn money. It is blood money !

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-3c4l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1690

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annette Shaughnessy

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change must not be implemented.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-wykt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1691

Comment on DOS-2017-0046-0001

Submitter Information

Name: Scott Sinclair

General Comment

Keep control over gun sales to foreign nations. Gangs would have even more power if they can buy weapons more freely.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-icqv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1692

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Perez

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-e0a8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1693

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eleanor Sylvestro

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-150w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1694

Comment on DOS-2017-0046-0001

Submitter Information

Name: Henriet Nadler cohen

General Comment

To Whom It May Concern,

I am a mother, a clinical Social Worker who is ardently concerned about the importance of gun control as a way to maintain a civilized society and protect human life from the use of guns to harm others.

Currently, I am wriing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because this rule change treats semiautomatic assault rifles as non-military." This is despite the fact that U.S troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts and the civilian possession of such weapons is proffibited in many countries. The proposed rule also" eliminates Congressional oversight for important gun export deal transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S and exports abroad by removing the block on 3 D printing of firearms.

This proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction and human rights, to an agency with a mission to promote trade and lacks the resources to adequately enforce export controls.

Keep The U.S State Department in charge and control of export license oversight for firearms.

Thank you.

Henriet Nadler-Cohen

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-flja Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1695

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gail Fleischaker

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a naked attempt to allow greater export, hence greater production -- all for the interests of U.S. arms manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-pro4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1696

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-s9o3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1697

Comment on DOS-2017-0046-0001

Submitter Information

Name: MIKE SHUNNEY

General Comment

Weapons manufacturers want to sell guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as "military." This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

[1] "Trump move would make it easier for U.S. gun manufacturers to export firearms," The Washington Times, May 14, 2018.

[2] "Trump wants to make foreign arms sales easier," The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] "American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall," The Trace, May 25, 2017.

[5] "The Trump administration proposes making gun exports easier. Here's how to submit your public comment on this dangerous proposal," Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-56yo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1698

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Doane

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The State Department will protect us against terrorism. Otherwise through commerce, we could enable ant-Americanist to arm itself and attack us.

Don't do it!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-r53p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1699

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am opposed to transferring the power of arms sales from the state department to the commerce department . We need fewer guns in this world Guns dont solve problems. People do. The NRA is only interested in making money on the sale of arms and not the lives of people they destroy.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-ovdr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1700

Comment on DOS-2017-0046-0001

Submitter Information

Name: A.M. Hess

General Comment

I oppose changing the rules to change regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department. U.S. weapons already flood the globe, fueling deadly conflicts worldwide, and I do not want Commerce pushing weapons as a business interest. The State Department's job is protecting our country, and they need to oversee firearms exports in order to do so.

Keep firearms exports under the purview of the U.S. State Department. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-dgcw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1701

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Thryft

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With this rule change, Congress would no longer be able to block sales of large batches of firearms to foreign countries, because it would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department does not have the resources to adequately enforce export controls and its Bureau of Industry and Security does not have staff everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-bmsa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1702

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Schwartz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-uvrd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1703

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Cassinelli

General Comment

As this nation currently has weapons enough for every man, woman and child extant , where is there a need for more of the same? The United States does not need foreign made weapons to become part of that current arsenal of arms in the nation.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-8f2r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1704

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am appalled at this idea and would like to see stricter gun laws not easier access through the absurd channel of the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-6ca4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1705

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl McDowell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-k5z3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1706

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenneth DeBey

General Comment

To whom it my concern:

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-bb9l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1707

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Holt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please don't switch the regulations from the US State Department to the Department of Commerce.

thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-f3x0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1708

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexander Kofsky

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-dxun Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1709

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynn Johnson

Organization: concerned citizen

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I strongly oppose this proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-bam2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1710

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Resciniti

General Comment

I am opposed to switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and it would further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-dgv7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1711

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Francina Golden

General Comment

I am totally opposed to switching control of firearms exports to the Commerce Dept. This will pose a threat to our national security at a time where there is great unrest in the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-cet4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1712

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Handelsman

General Comment

Keep arms export licenses in the State Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-z1d5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1713

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Wallin

Organization: Wallin Mental Medical

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-dfd1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1714

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dave Batten

General Comment

It would be a colossal mistake to treat firearms, particularly semi-automatic weapons, as commodity for export. Providing lethal weapons abroad requires thoughtful review and followup that should remain with the State Department. Let's not export violence to the world in the name of making a buck for weapons manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-mm8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1715

Comment on DOS-2017-0046-0001

Submitter Information

Name: jennifer valentine

General Comment

I oppose the rule change

the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-wxwx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1716

Comment on DOS-2017-0046-0001

Submitter Information

Name: Geneva Metzger

General Comment

Please do not switch the oversight of the sale of hand weapons from the Dept. of State to the Dept. of Commerce. Our nation has the highest number of deaths committed by regular citizens with personal guns than anyplace else in the world. We should not want this happening anyplace else in the world since we already know that our country has not wanted to or has not been able to deter the number of deaths in this country via personal guns. We should not do anything that would make this a problem or a worse problem anyplace else in the world. The Dept. of Commerce can be pressured by large businesses and might let that pressure by gun manufacturers to influence them to relax rules. We have more than enough deaths every year than we should because of guns. We should not export that problem anyplace. God only can help us if we export this problem to the rest of the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-yvg5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1717

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annabelle Van Dyke

General Comment

I strongly oppose the proposed rule change that would switch regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department. Some countries that should not have access to large shipments of firearms would benefit from this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-qfo4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1718

Comment on DOS-2017-0046-0001

Submitter Information

Name: K.V. Schwartz

General Comment

I oppose moving international traffic in arms regulations from the State Department to the Commerce Department because the Blue Lantern program of the State Department is highly effective at preventing sale of firearms to countries with human rights violations.

State Department also blocks exportation of firearms to countries and organized crime groups that pose a security threat to the US. The Department of Commerce lacks experienced professionals capable of determining which potential recipient countries pose a security threat to the US.

We must aim for world peace, not maximizing gun exports to enrich US arms manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-iwg0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1719

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eve Gregg

General Comment

Why does the government allow itself to be bullied by the NRA?!?! Regulating arms sales is the job of the State department. Gun manufacturers already profit enough from guns terrorizing U.S. citizens--don't open new floodgates for arms sales internationally and further jeopardize our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-c2nj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1720

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynda Schneekloth

General Comment

I STRONGLY oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

1. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
2. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-2pak Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1721

Comment on DOS-2017-0046-0001

Submitter Information

Name: victoria wade

General Comment

I am writing today to voice my sincere opposition to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This move would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would REMOVE this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is unacceptable.

Thank you for your time and consideration of my comment.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-9l2f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1722

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrew Michaelson

General Comment

I oppose the rule change that loosens the Blue Lantern program my decade of experience in police work made it very clear to me that wider availability of guns directly leads to more deaths.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-5saf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1723

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Milliken

General Comment

I write to let you know that I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-u0pc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1724

Comment on DOS-2017-0046-0001

Submitter Information

Name: BrendaLee Lennick

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Submit comments now to the State Department and the Commerce Department opposing the rule change.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place. #VeteransForPeace
#MomsDemandAction

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-vtgr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1725

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Berrill

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-yye3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1726

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Tischhauser

General Comment

I am strongly opposed to moving the administration of export licenses for weapons to the commerce Dept. whose emphasis would be on approving sales rather than concern for American safety. There are too many weapons loose in the world now without opening the floodgates for more.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-pgc0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1727

Comment on DOS-2017-0046-0001

Submitter Information

Name: Wendy James

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please keep firearms exports classified as military because they are! And keep it under the regulation of the State Department, so that Congress can block sales of large batches of firearms to foreign countries in the name of national security or human rights concerns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-g09g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1728

Comment on DOS-2017-0046-0001

Submitter Information

Name: Caitlin Johnston

General Comment

I am against any changes to international regulations governing the sale/export/import of firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-z4kk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1729

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Rosenblum

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-3iay Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1730

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Thomson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-83tc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1731

Comment on DOS-2017-0046-0001

Submitter Information

Name: Virginia Keith

General Comment

My name is Virginia L Keith, I live at 4531 14th Ave S, in Minneapolis, Minnesota 55407

I am opposed to the rule change that would make it easier to sell guns around the world without adequate oversight. Also 3 D printing of guns rule should NOT be changed. We are a wash in guns I know the GOP thinks we need more guns but that is just wrong. We need to keep the oversights we now have and not to change them for a quick buck.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-qtxd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1732

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Jane Engh

General Comment

I strongly oppose changing the control of arms exports from the State Department to the Commerce Department. This would deprive Congress and the State Department of the ability to prevent U.S. gun manufacturers from arming dictators, rebels, civil wars, criminals, and enemy regimes around the world, all in the name of profit.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-cdp2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1733

Comment on DOS-2017-0046-0001

Submitter Information

Name: Esther Diamondstone

General Comment

I oppose moving the regulations of firearms exports from the State Department to the Commerce Department. Haven't we already had enough of Americans being killed abroad by American weaponry in someone else's hands?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-b8i6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1734

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sue Remaley

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-5und Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1735

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sr. Margaret Ann Arnold

General Comment

I oppose the rule change that would switch regulations of firearms from the US State department to the US Commerce Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-3r2t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1736

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Colvin

General Comment

I oppose change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder, Cody Wilson, posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws. They were able to do this because his open-source posting made it possible for anyone with access to a 3D printer, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

For these reasons, I believe this is an irresponsible rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-u7fi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1737

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-mkeo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1738

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joann Hagen

General Comment

I am very opposed to a change to the Dept of Commerce because of the lack of oversight which makes it easier to traffic gun and allow 3D printing of weapons. Our government will lose control of sales. De we really want to be the arms seller to the whole world ? Don't fall for this NRA push. Guns do not make us safer...here at home or in the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-u7of Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1739

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-97in Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1740

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ken O'Connell

General Comment

To whom it may concern,

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

So please keep gun sales the way are, under the State Department.

A concerned Navy Combat Veteran!

Sincerely,
Ken O'Connell

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-pxvf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1741

Comment on DOS-2017-0046-0001

Submitter Information

Name: Don Hnatowich

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-huf7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1742

Comment on DOS-2017-0046-0001

Submitter Information

Name: Adam Mills

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-lqhj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1743

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Richardson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-b8ff Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1744

Comment on DOS-2017-0046-0001

Submitter Information

Name: Louis Russ

General Comment

My son Hanif Russ was shoot & killed in April 2016 as result of the excessive easy access of guns in .
B'ham police know the killer but have yet to arrest him
They probably feel that since he was not from a prominent B'ham family is life does not matter to them.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-38n0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1745

Comment on DOS-2017-0046-0001

Submitter Information

Name: margaret medford

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

As a voting citizen, I ask you NOT to change the rules!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-wn6e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1746

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joel Trupin

General Comment

I oppose any rule change that would make it easier to sell guns, including putting regulation over such transactions into the Commerce Department. Guns are a major problem in this country, as well as in other countries where our arms industries do business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-ordp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1747

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anita Knipping

General Comment

I vote no against this. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking, and it would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please reconsider your stance. It's dangerous enough here as it is.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-qjok Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1748

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeannette Stokols

General Comment

I strongly oppose any change in regulation of firearms from the State Department to the Commerce Department. There are so many countries and non-state actors that would take advantage of any laxity in this regulation and this could create more violence, chaos, repression in countries around the world. There is already enough violence in the world without making it even easier to enact it.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

All of the effects below would be highly detrimental to safety around the world and ultimately, hurtful as well for U.S. citizens:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-72c3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1749

Comment on DOS-2017-0046-0001

Submitter Information

Name: Raven Deerwater

General Comment

On this Independence day, please do not shift the exporting of military grade firearms to the Commerce Department -- all it will do is fuel terrorism and make the world less safe. Do not trifle with US Security so gun manufacturers can get more sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-nd0g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1750

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Mendoza

Organization: retired

General Comment

I strongly object to and resist the suggested change of control of worldwide automatic weapons sales out of the State Department and into the Department of Commerce. This change would encourage the arming of the world - without the reviews necessary to protect this nation! This is a bald move to increase the sales of weapons manufacturers and the NRA. This must not happen!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-j8kd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1751

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine White-Fletcher

General Comment

Please do not allow exportation of our deplorable gun policies to other countries thru passage of this bill!! No one, no other society need do the research on the ultra violent effects of increased access and decreased oversight of firearms proliferation! We are living - and dying proof - that this is a bad idea and not at all what the founding fathers had in mind!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-au1v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1752

Comment on DOS-2017-0046-0001

Submitter Information

Name: Holly Dhynes

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9434-cn4o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1753

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill allbritton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-n7ro Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1754

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vanna Cleary

General Comment

I am totally against changing the supervision of gun and munition sales to international buyers from the State Department to the Commerce Department. The sale of these weapons of war should not be governed by people only interested in the fostering of commerce. These are not typical exports. These exports kill people. Their governance should be with the department that is more concerned with maintaining peace, rather than with the department that is concerned primarily with fostering profit.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-xf9n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1755

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annie McCuen

General Comment

Oh my goodness.... who would want proliferation of guns, arms of any kind.... greedy, fearful, mean spirited people! Look what happens in our poor country, look what happens where guns are funnelled in around the world... chaos, mayhem, abuse, hunger, decimation of ethnic groups... the culture of guns prays on masses who feel inferior, cheated, fearful, the sick in mind who have no other means but vengeful behavior. How terribly sad for such a small planet!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-x7yp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1756

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Besser

General Comment

You can write in something like: I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Turning firearm sales into a commodity is not the way to address gun violence; it would just be another score for the NRA and the gun industry.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-3tzip Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1757

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gertrude Crowley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Another terrible idea put forward by this administration to promote more war and terrorism around the world. Do not try and pull the wool over Americans' eyes, this move jeopardizes our safety and futures further.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-siyw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1758

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Dutschke

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department .

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce

Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal

agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes

countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-moxy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1759

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eleanor Rizzo

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-u2ay Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1760

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Najemy

General Comment

Flooding the world with assault weapons will bring mayhem to the rest of the world, as it has to our own country. Such weapons could easily find their way to terrorists. This should be stopped.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-1zu5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1761

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tlaloc Tokuda

General Comment

The proposed rule changes that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department is a NO BRAINER! This rule change must have been dreamed up by the NRA and gun manufacturers! What does the Commerce Dept. try to do? SELL MORE! Who are the people who normally get guns, war lords, gangsters, military juntas, etc.?! Trump and his Republicans cronies are always talking about the national security but these rule changes would put more lethal weapons into the wrong hands and make us less safe.

I was thinking how can anyone come up with such a crazy idea, then realize how strong the NRA and its lobbyist are. This rule change will make the world a totally UNSAFE PLACE. This rule change should NOT be entertained or applied!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-9eeg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1762

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

No, this change in arms regulations must not be approved. For gunsmiths to have to fill out a little paperwork and pay fees is merely inconvenient and a small price to pay to keep military style weapons out of the hands of terrorists and crazies who like to shoot up schools and public places. We need MORE regulation, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-h3k9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1763

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Loewenstein

General Comment

1. Do not eliminate the Blue Lantern Program.
2. Do not eliminate licensing for Brokers
- 3, Do not remove black on 3d printing of Firearms

Firearms are dangerous. Most people know how to use them, what they don't know is WHEN to use them, IF EVER.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-emyo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1764

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Eusey

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. What type of moronic stupid and evil is behind this proposed change is ghastly abhorrent and as a proud American, its just unthinkable. You have my permission and encouragement to publicly bitch slap the moron(s) behind this bonehead stupid proposal. This is wrong, its immoral, its stupid personified, its evil, its unpatriotic, and I hope everyone has the common sense and decency to toss this back into the shit can of stupidity from whence it came. Thank You!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-frw3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1765

Comment on DOS-2017-0046-0001

Submitter Information

Name: Don Hunter

General Comment

I believe the U.S. should strictly regulate the sale of firearms to other countries. The State Department is more appropriate than Commerce to oversee the sales. Further, the U.S. government should not encourage sales of firearms to other countries. The gun industry has shown that it will go to extreme lengths to promote firearm sales, without consideration for the societal impacts of doing so.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-wqce Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1766

Comment on DOS-2017-0046-0001

Submitter Information

Name: PJ Stewart

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We must protect society in general, but especially our children and grandchildren in schools, parks, and everywhere.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would also eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the world.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-1kc4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1767

Comment on DOS-2017-0046-0001

Submitter Information

Name: dixie fletcher

General Comment

I oppose the transfer of this important role of monitoring the sale of guns and assault weapons from the State Dept to the Commerce dept. As we have learned in the past, selling guns to other countries can come back to bite us in the ass when those same weapons are used against us later!! Any sales of firearms should be carefully monitored and the commerce dept does not have the staff to manage this. Please leave this important task in the hands of those who care about human rights and issues of the abuse of power. sincerely,
Dixie fletcher

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-mhy5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1768

Comment on DOS-2017-0046-0001

Submitter Information

Name: frances hugg

General Comment

The United States already holds the world's record for mass shootings among a civilian population not engaged in a war or civil conflict! Now by this horrendous change from the State Department to the Commerce Department, you want to endanger us to mass shootings abroad as well! You want the NRA to spread its mayhem of death throughout the world! This is unconscionable! and unacceptable! SHAME ON THE TRUMP ADMINISTRATION AND ITS RECKLESS DISREGARD FOR HUMAN LIFE IN THE NAME OF GREEDY PROFIT FOR THE GUN MANUFACTURERS!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-wepe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1769

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I would appreciate the US Department of State reconsider the implications of International Traffic in Arms Regulations. The US doesn't need everyone having access to weapons to use against us. Like they say, if someone wants a weapon, they will find it one way or another, which usually means someone is going to get hurt. There is enough hurt in this world to last a lifetime or two. Please investigate the awful ramifications of this change. Thank you for your consideration in this matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-2ipl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1770

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Kuning

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The NRA is supporting and pushing this legislation to enable gun manufacturers to reap more profits at the cost of more innocent lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-q1eu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1771

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-dy9c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1772

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Muir

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. If this change is made, Congress would no longer be informed of large arms sales or be able to block them. Military-style weapons, such as semiautomatic assault weapons and other powerful firearms, could be exported to dangerous foreign countries, threatening our national security. Furthermore, the Commerce Department does not have the resources to adequately enforce export controls, so firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This change would also eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. And it would remove the State Departments block on the 3D printing of firearms, allowing anyone to make unlimited numbers of weapons.

This administration has claimed that our national security is risked by immigrants at our borders, but this change -- initiated only for motives of profit -- would have the effect of increasing civil wars and gang violence in foreign countries that would bring more people seeking asylum to our borders. Our non-stop wars on terrorism would be made more difficult and costly if our enemies can purchase military-style weapons with impunity.

For all these reasons, this change of regulatory control would be serving the arms makers, but hurting the country as a whole. I oppose it and I hope you will too.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-ber5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1773

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leslie Herman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[1]
- It would remove licensing requirements for brokers, increasing the risk of trafficking.[2]
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[3]

[1] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[2] Ibid., Violence Policy Center.

[3] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-wemu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1774

Comment on DOS-2017-0046-0001

Submitter Information

Name: James and Leslee McPherson

General Comment

I oppose changing oversight of gun sales from the State Department (national security) to the Commerce Department (boosting American sales abroad). The USA should not become an international death merchant.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-4ku8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1775

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelly Mcconnell

Organization: 2EZ Computers

General Comment

STOP arming the world. The US is THE largest terrorist organization in the world today. The US is THE largest supplier of weapons to EVERY COUNTRY IN THE WORLD. The US is THE largest instigator and enabler of violence and conflict in the world.

I am ashamed to say that I'm an American and when I travel outside the US I'm afraid to admit I'm an American because we have ensured that most of the world hates us by fostering violence and repression and protecting the biggest polluters and resource thieves from local accountability everywhere we, as a country, go.

WE are the worldwide threat to democracy that we accuse others of being and that needs to STOP.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-jccm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1776

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Johanessen

General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-3j9o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1777

Comment on DOS-2017-0046-0001

Submitter Information

Name: JORDAN ROSS

General Comment

Please do not transfer power over gun sales from the State Dept. to the Dept. of Commerce. This will only encourage more gun sales and violence in this country.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-z724 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1778

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose shifting the regulation of firearms from the U.S. State Department to the U.S. Commerce Department. Such a move would open the sale of massive amounts of weapons to international use. This would be a security threat to both the U.S. and the world. Terrorists could then buy these weapons. Is this what we want?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-5w7e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1779

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marianne Ludwig

General Comment

I am appalled about the proposed rule change giving the department of commerce the right to expedite the overseas sale of automatic weapons. We have so many problems with guns in our country and now we seek to export those problems abroad? This is madness!

The State Department is the proper department to determine the need, if any, of these licenses. Lets clean up our own mess before we start destroying someone elses Homeland.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-twy5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1780

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angie Kung

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-ta2x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1781

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Rohde

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I want to keep our country safe & the world safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-yz3h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1782

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jo Niemann

General Comment

The sale of firearms requires more control, not less, because they kill people around the world every day in acts of terror, political violence, gang warfare, and domestic violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-iy9q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1783

Comment on DOS-2017-0046-0001

Submitter Information

Name: Scott Karstetter

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-9gap Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1784

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-2mxu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1785

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Calhoun

General Comment

I oppose any rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department, which would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-kq01 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1786

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn Guterma

General Comment

The idea of moving the regulation of firearms exports from the state department to the commerce department is truly a bad idea. To cite just a few reasons it would make it easier for dictatorial regimes, organized crime and terrorists to obtain guns in large quantities. It would remove the state department block on the 3D printing of firearms which would make things even worse. It would allow for the destabilization of countries with massive unrest and countless deaths. Please, in the name of peace and sanity do not allow this to happen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-mief Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1787

Comment on DOS-2017-0046-0001

Submitter Information

Name: Melanie Lipton

General Comment

I oppose this rules change to switch the regulation of fire arms export from the US state department to the US commerce department

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-68c2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1788

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanna Kapner

General Comment

I strongly support keeping the regulation of firearms sales under the jurisdiction of the State Department. Do not transfer control to the Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-9mo7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1789

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Bannister

General Comment

I OPPOSE removing firearm exports from DOS and putting them under Commerce Dept. This change would be extremely bad for national security, for the U.S., and for the international community. Removing arms exports from DOS will make it much easier for arms traffickers, organized crime, terrorist organizations, and rogue states to obtain large quantities of American guns and ammunition. There is no American interest that is served by such a move, as the beneficiaries would seem to be limited to criminals, arms manufacturers, and the NRA.

Removing arms exports from DOS control and oversight would eliminate the Blue Latern program of inspections and reporting;

eliminate broker licensing requirements, which will increase trafficking; eliminate the DOS block on open source instructions for 3D firearm printing; eliminate the ability of Congress to block, in the name of national security, large batch firearm sales to foreign nations; and significantly reduce our ability to enforce firearms exports by putting it in an agency that does not have the ability, experience, or worldwide staff and resources to adequately perform this critical function.

Please, in the immediate and long-term interest of the national security of our country, do NOT move the regulation of firearm exports from DOS to Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-r3da Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1790

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristina Cliff-Evans

General Comment

This is a horrendous plan and must not happen. Do not agree to this NRA plan to increase the revenues of ggun manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-tjpb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1791

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margy Patchin

General Comment

This change would set a dangerous precedent.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-vy1a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1792

Comment on DOS-2017-0046-0001

Submitter Information

Name: KAREN COULSON

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-ybsp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1793

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Yen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-syor Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1794

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabethann Border

General Comment

I am SICK of the NRA running our country. It is time for change and you either get on the rising tide or lose your seat!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-us7l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1795

Comment on DOS-2017-0046-0001

Submitter Information

Name: CAROL MARSH

General Comment

The proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department is a horrific idea. Assault weapons have no purpose except to kill human beings, and if the United States starts selling guns around the world to anyone who has the money, the only possible effect would be a massive increase in violent death everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-j5ig Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1796

Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Freidenreich

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports should continue to be classified as military so that Congress can block sales of large batches of firearms to foreign countries, if it sees fit. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-go0t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1797

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Guideau

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-hutb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1798

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Dalrymple

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-vljx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1799

Comment on DOS-2017-0046-0001

Submitter Information

Name: Teresa Allen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The regulation of firearms should not be about the making of money but the protection of the populace!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-x32c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1800

Comment on DOS-2017-0046-0001

Submitter Information

Name: John R. Thayer

General Comment

Do not transfer your authority over this to the Commerce Department. You are responsible for keeping us safe. That is NOT the responsibility of the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9435-c64m
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1801

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Mudrick

General Comment

The proposed rule change is dangerous.

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

I am opposed. Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-crf9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1802

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous from NH Anonymous from NH

General Comment

Dear Regulatory Assistant:

This letter is in opposition to letting the NRA populate the WORLD with arms, especially military arms. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They (the NRA) are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.]

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. In a corresponding article, Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018, this spells disaster because Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. We've already seen what massive damage the AR-15 does in America, especially killing innocent people in schools. WE DON'T NEED THE NRA AND THE UNITED STATES DELIVERING MILITARY OR OTHER GUNS AND AMMUNITION BEING SOLD TO THOSE WHO CAN HARM AND KILL INNOCENT PEOPLE FOR GREEDY PURPOSES.

Thank you for listening!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-kzye Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1803

Comment on DOS-2017-0046-0001

Submitter Information

Name: D Jessop

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The purchase of guns should be a much more rigorous process with regular (i.e. yearly) mental evaluation and many other requirements. It's ridiculous that any person - sane or otherwise - can purchase a gun in our country.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-j4qu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1804

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Solomon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition if the switch is allowed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-9zfb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1805

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Williams

General Comment

I oppose the rule change that would switch the regulations of firearms export -- including semiautomatic assault weapons and other powerful firearms -- from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open the floodgates for arms sales internationally, which will seriously undermine our national security when they flow back through our borders illegally and without background checks. The interests of the members of the gun lobby should never be more important than the safety of the American homeland.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-6p03 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1806

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Schultz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-f8o8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1807

Comment on DOS-2017-0046-0001

Submitter Information

Name: Curtis Coulson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

We do not need the invisible hand of the market increasing the number of guns in the world. And to allow 3D printing of weapons is asking for more mayhem in public spaces.

All for a few dollars.

This is like promoting smoking or recreational opiod use. Future generations will look back and marvel at our stupidity.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-6iy1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1808

Comment on DOS-2017-0046-0001

Submitter Information

Name: Juliette Blount

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is ridiculous and we need to stop pretending that our government is powerless to improve this situation. We know better. It is time to do better!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-9p5z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1809

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Holley

General Comment

I oppose the rule change shifting overbite for weapon sales to the commerce department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-w4wq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1810

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sherry Abts

General Comment

To Whom It May Concern,
Firearms regulations should REMAIN within the jurisdiction of US STATE DEPT not Commerce Dept.
For better SAFETY of all Americans please keep Firearm regulations under control of US STATE DEPT.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-d644 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1811

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Mutch

General Comment

I think your money would be much better spent for the common good by investigating why guns in the hands of civilians are necessary.
Except for hunters, civilians should not need arms if there availability is closely monitored.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-4r32 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1812

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrew Tomasik

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-1csk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1813

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lindsay Mugglestone

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-vn01 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1814

Comment on DOS-2017-0046-0001

Submitter Information

Name: Victoria Silver

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The State Department can better control the global flow of firearms from the US than Commerce, which does not have the personnel or the bureaucracy to do an effective job. This is simply a sop to the firearm industry promoted by the NRA. Do not change the status quo.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-6gkg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1815

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Shannon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-3cyj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1816

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marsha McCroden

General Comment

The rule belongs at the State Department. It is a national security issue. Without it we have no way of telling who is buying, transferring large amounts of arms from the US and to whom we are selling to. I thought this was addressed in the 1980s, when Reagan was selling arms to Khomeini and the proceeds were used to fund the Nicaraguan Contras.

The NRA has put so many roadblocks in the way, we can't even control who has how many guns, if they should have access to them or not, who is buying them online or at gun shows and if they are on terrorist watch lists.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-wd3x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1817

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alaina Hebert

General Comment

Guns are the number 1 cause of death in America. This must stop.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-kvo9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1818

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roberta Martin

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-jbnp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1819

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Wright

General Comment

I oppose this rule change that would switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department. This matter is a national security issue and should be subject to regulation and oversight by the State Department and Congress. This responsibility should not be transferred to the U.S. Commerce Department, which has an obvious motivation to increase firearm exports without proper regard for our national security. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-lghp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1820

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debbie Royalty

General Comment

Dear sirs/Madams,

It has been brought to my attention that the NRA and gun manufacturers are lobbying for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other firearms from the U.S. State Department to the U.S. Commerce Department. I strongly disagree with this rule change. This would allow for the focusing of arms sales on economics not on safeguarding persons and country. This transfer of authority would have serious negative implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-v865 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1821

Comment on DOS-2017-0046-0001

Submitter Information

Name: Olivia Diaz

General Comment

This move to the Dept of Commerce is totally inappropriate. I vehemently oppose the move.

By promoting sales throughout the world, our security, as well as the security of the world's population is put in further peril.

Keep the regulations on export licenses of automatic weapons under the purview of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-4y0m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1822

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betsy Hand

General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department. The State Department is the appropriate agency to regulate firearms (weapons) sales. The Department of Commerce is more aligned with promoting businesses, whether firearms or couches.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-tsj0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1823

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Aragon

General Comment

Guns are a nuisance and a danger in our society. It even says in the Constitution that they should be 'well-regulated' and yet here we: guns for everyone and their Aunt Tillie. This is nuts. Regulate these enablers of harm, these vehicles of hate. The members of the NRA may be buried up to their ears in guns and bullets, but they are vastly out-numbered by all of us other citizens who don't feel the need to carry a gun when we go for our coffee - because we're adults who don't need security blankets to carry on our daily affairs.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-p9xo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1824

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Johnson

General Comment

I strongly object to the transfer of control of weapons sales out of the department of state. The department of commerce has no experience with this and the transfer would lead to more weapons in the hands of criminals.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9435-655r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1825

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Melina

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, and terrorism, and human rights violations. They should be subject to more not less regulation. Please leave the authority to oversee international arms sales with the State Department. It will help make our country and our world a safer place.

I know the devastation that firearms cause. As the designer of the Massachusetts Memorial to Homicide Victims, The Garden of Peace, I have listened to the stories of heartbreak experienced by parents who have lost children to gun violence. Don't expose the rest of the world to the horror of mass shootings; school shootings and church shootings, concert shootings, and nightclub shootings and all the other daily violence that we experience in this country! Please.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-bopc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1826

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stacie Slay

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please halt this clear attempt to profit on the World's instability and atrocities.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-780x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1827

Comment on DOS-2017-0046-0001

Submitter Information

Name: Luke Ouradnik

Organization: Midco

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-8o5v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1828

Comment on DOS-2017-0046-0001

Submitter Information

Name: Valerie Rounds-Atkinson

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-b4a2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1829

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jack Milton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-hdiw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1830

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please keep the export licenses for assault weapons and other firearms with the U.S. Dept. of State - Dept. of Commerce should not be in the gun business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-7bkb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1831

Comment on DOS-2017-0046-0001

Submitter Information

Name: Krista Florin

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-39ks Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1832

Comment on DOS-2017-0046-0001

Submitter Information

Name: Penelope Sweeting

General Comment

Giving the Commerce Dept control of war weapons is not a good thing for America. Trump will not be around forever, causing an imbalance in small nation's powers is not going to help us. It will cause our actual immigration service (not ice] to be unable to keep terrorists out.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-bzhs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1833

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Abbott

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This should require diplomatic supervision. It should be more than just a business decision.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-dexq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1834

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barb Travis

General Comment

I adamantly oppose changing the rule that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. If this rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep illegal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-rwhf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1835

Comment on DOS-2017-0046-0001

Submitter Information

Name: judith cohen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S Commerce Department.

Switching this regulation would facilitate firearms exports tot oppressive regimes, remove safeguards that help extra-legal agents like organized crime and terrorist organizations from obtaining weapons and further fuel violence that destabilizes countries and cause mass migration..

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-2dpb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1836

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

Organization: Mom'srising.org

General Comment

"I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Safeguarding our nation to putting it up for sale is UnAmerican. This new ruling transfers the authority from the US State Department whose focus is safeguarding our nation to the US Commerce Department whose focus is promoting business. Of course, the NRA and gun manufacturers want this as it will open new floodgates for arms sales internationally with serious implications for our national security. Thus democracy is sabotaged for both our country and we the people--all for the sake of fulfilling corporate and individualistic self interests.

The following are details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Kindly refrain from supporting this ruling as it will not serve the common good nor the values and culture that formed the United States of America.

Respectfully yours,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-6wue Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1837

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Eaton

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal

agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of

pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody

Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with

violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer,

anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of

firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political

violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-yxzm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1838

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Garrett

General Comment

I am opposed to this rule change because I feel it would threaten our national security and ultimately put more weapons in the hands of terrorists who would use them against us. International sales of large quantities of firearms should remain under the control of the State Department. Congress should remain automatically informed about sizable weapons sales that it could stop in the name of national security. It is important that this Congressional power remain as the Commerce Department does not have the resources to adequately enforce export controls. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition, which could ultimately be used against our own military or our own civilians. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are a dangerous threat to civilized society. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-mrfh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1839

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn Britton

General Comment

I VERY STRONGLY oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you know, currently firearms exports are classified as military and therefore are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. But with the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

We are having more than enough problems, especially with automatic weapons, and we definitely DO NOT need to spread that problem around the world. It sounds like a change for NRA GREED wanting to get more sales with no concern for anyone's welfare.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-1kt8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1840

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lora Farber

General Comment

This is dangerous. The 3D printing capability is terrifying. You are giving away the safety of our public spaces to the highest bidder. Lives are not less valuable than profits. Do the moral thing and stop this while you can.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-n54n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1841

Comment on DOS-2017-0046-0001

Submitter Information

Name: AMY ASSAEL

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-2oeu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1842

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gabrielle Meeker

General Comment

Firearm exports must stay in the realm of the State Department and not be transferred to Commerce. The Commerce Department is not equipped to handle these exports which are military in nature. The State Department already has what it needs to control this important activity. Changing it to Commerce is not only a waste of resources but reduces the safety of firearm export

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-rnt2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1843

Comment on DOS-2017-0046-0001

Submitter Information

Name: Terry Travis

General Comment

I adamantly oppose changing the rule that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. If this rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep illegal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-g72k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1844

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Saamann

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place because:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre- license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Say no to the NRA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-js3u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1845

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Jones

General Comment

Please don't change firearms export regulations. America is already unsafe for the average citizen due to lax firearms regulations. Don't export the dangers of firearms to other countries. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-ci3v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1846

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bonnie Gorman

General Comment

gun manufacturers are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.
Please OPPOSE this transfer on grounds of national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-3lu4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1847

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary T

General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department. The Commerce Department is not equipped to do this work and it would a very irresponsible move that would haunt the U.S. down the road.

Removing this responsibility from the State Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Beware of the snake that will end up biting its own tail and eating itself alive.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-62hz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1848

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Stone

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-wvcr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1849

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kent Minault

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Keep the rules the way they are.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-6l9m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1850

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Driscoll

General Comment

Where gun sales are concerned, the more regulations and overview the better. All over the world, too many people are being killed unnecessarily. Therefore, it is important to keep this under the State Department instead of the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-2sa2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1851

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanne Tenney

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would open new floodgates for arm sales internationally with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-vh64 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1852

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheila Siegel

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-5v40 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1853

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I do not think we should be pushing gun sales in other countries. We already have issues with the gun sales happenjng here

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-wsak Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1854

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joseph Ambat

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-vsf4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1855

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Byron

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-yjc2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1856

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Dycus

General Comment

I oppose the change, of the Fire Arms Rule from the U.S. Department of State to the U.S. Department of Commerce.

The sale of Fire Arms is a very dangerous and needs to be regulated as such, not like a piece of clothing, toys, or food.

Thank you, Diana Dycus 46304

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-5g6h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1857

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Hanks

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I strongly oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-4xp6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1858

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katie Barnett

General Comment

I oppose the proposed rule: International Traffic in Arms Regulations: US Munitions List Categories I, II, and III.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[1]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[2]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[3]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[4]

[1] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[2] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[3] Ibid., Violence Policy Center.

[4] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-qlwg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1859

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

In the name of Americas security, how can you consider letting guns become part of the Commerce Department? We should not be in the business of selling guns we should be limiting the purchase of guns. Stand up for Americans and their security not The NRAs business plan, all guns everywhere, all the time.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-vio Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1860

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Keefe

General Comment

Weapons kill people here and everywhere they are sold around the world. It is time to support nonviolent solutions in areas of conflict and there are organizations ready to do this work (Nonviolent Peaceforce). Violence from weapons causes more violence and much more death and destruction.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-tv57 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1861

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jason Magidson

General Comment

I oppose the proposed gun exports rule change for the following reasons:

It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

It eliminates Congressional oversight for important gun export deals.

It transfers the cost of processing licenses from gun manufacturers to taxpayers.

It removes statutory license requirements for brokers, increasing risk of trafficking.

It reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

It enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

It reduces transparency and reporting on gun exports.

It transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-5h1r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1862

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Gillespie

General Comment

I think this is a dangerous route to go. There are already too many arms out there. This is just a way to run around oversight. Please resist the NRA's attempt to increase profits for arms manufacturers at the expense of common sense.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-dv8e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1863

Comment on DOS-2017-0046-0001

Submitter Information

Name: Spenta Cama

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

****It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.**

****It would remove licensing requirements for brokers, increasing the risk of trafficking.**

****It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.**

Please do the needful and right thing and keep this with the State Department.

Thank you for your consideration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-yjir Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1864

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stanley McDonald, Jr.

General Comment

I strongly oppose any transfer of US Arms Regulations from Dept. of State to Dept. of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-kkot Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1865

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Cunningham

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-ihz2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1866

Comment on DOS-2017-0046-0001

Submitter Information

Name: Valerie Klauscher

General Comment

I am adamantly opposed to allowing export licenses of semiautomatic assault weapons and other powerful firearms to be overseen by the U.S. Commerce Department rather than the U.S. State Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I also demand that you vet all comments that are posted on both the DOS and BIS sites for bot traffic. I am an actual citizen of the Commonwealth of Pennsylvania, USA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-g2pt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1867

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Mountsier

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe this is counter productive to the American interests and will only bring more instability and violence to other countries. I believe it is critical that the State Department retain the important function of overseeing any types of sales or exports of guns or other military equipment.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-ql1r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1868

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paula H

General Comment

This is truly outrageous. Neither gun manufacturers, nor the president should have this power. What is happening to our country? It feels like we are becoming a dictatorship and a fascist one at that. This certainly looks like the merger of corporation and state, a large part of the definition of fascism. Our country spreading weapons around the world does not help people or the environment. Congress needs to declare wars and needs to decide on weapons sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-sny2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1869

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Giesy

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

In particular, the interests of the citizens of the United States are better served by the status quo than by the proposed change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-a0j3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1870

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandi Hebley

Organization: Cathedral of Hope

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-7jyw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1871

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Wehrman

General Comment

I oppose this proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-v0hk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1872

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Crooker

General Comment

The sale of weapons to other countries (or entities therein) should be in a manner which respects said country's laws. It should

be done in a manner which supports, not aggravates, our foreign policy, and therefore oversight belongs with the State Dept.

To shift this responsibility to the Commerce Dept. is to put business first; it makes the U.S. no better than gun runners.

The last thing we need is to export our problems (e.g., assault weapons for individuals, large magazines) to other countries, and make it harder to work diplomatically with them.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-faxh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1873

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Morton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This is a very bad policy proposal that will make the US less safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-odsv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1874

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrew Kistler

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This idea is dangerous and irresponsible.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9436-6yt4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1875

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Iltis

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-r28o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1876

Comment on DOS-2017-0046-0001

Submitter Information

Name: Phoebe Farag

General Comment

I am against switching the regulation of firearms exports from the State Department to the Commerce Department. A switch like this would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The export of firearms should be done by experts in diplomacy, not experts in business. The United States is already a huge exporter of arms to the world, and changing this rule would make the world even MORE dangerous than it is:

1- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2- It would remove licensing requirements for brokers, increasing the risk of trafficking.

3- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-2hzb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1877

Comment on DOS-2017-0046-0001

Submitter Information

Name: Li Goodman

General Comment

I am opposed to a rule change that would move the regulation of firearms and ammunition to the Commerce Department. Selling more weapons to foreign nations will endanger our national security. Remember all the uproar over Fast and Furious?
Remember the arrests over the Iran-Contra Affair?
The world is already a dangerous place without more American weaponry flooding the market.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-dpm8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1878

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hattie Gerrish

General Comment

I am opposed to these anti-security rule changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-nveg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1879

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joan Russo

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-rnn3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1880

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Naifeh

General Comment

Regulation of fire arms needs to have stronger regulations. Assault weapons need to be banned.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-m8vo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1881

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Johnson

General Comment

I am against changing the regulations for the selling of guns to the Commerce Department. The U.S. does not need guns falling into the hands of terrorists all over the world. We have enough problems keeping guns out of peoples hands in our country. How would the Commerce Department ever determine who could buy the guns. Our Countrys safety is more important than increasing gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-tmlu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1882

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlene R Tandler

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further more, changing this rule would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking and it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-c1tt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1883

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Malone

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Help keep our nation safer from groups who would rapidly take advantage of this change to stockpile more arms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-96o3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1884

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jackie Weisberg

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-xnkn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1885

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bertino Marro

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Currently, firearms exports are classified as military and are under the regulation of the State Department, enabling Congress to block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that should be stopped in the name of national security - even to countries where there are serious human rights concerns.

Furthermore, the Commerce Department does not have adequate resources to enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Thus firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-evow Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1886

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine Wood

General Comment

This proposed change of transfer export licenses of semiautomatic assault weapons from US State Department (focused on safeguarding our nation) to the US Commerce Dept. (focused on promoting business & profits) doesn't make any sense. Arms sales internationally has serious implications on national security. I do not trust someone looking to make money to protect my countries security.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Are you crazy! This makes me fear for the safety of the country. Business in charge of national security?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-l5uw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1887

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-2nzk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1888

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Kelcher

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-yxb4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1889

Comment on DOS-2017-0046-0001

Submitter Information

Name: Briar Winters

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-mo6j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1890

Comment on DOS-2017-0046-0001

Submitter Information

Name: Drew Pelton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new portals for arms sales internationally, with serious implications for our national security.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-l5hj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1891

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Emrick

General Comment

This is a change that is unnecessary and ultimately dangerous. Until we have the safe use of guns in our country and fewer Americans killed or injured seriously then this is an outrageous request.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-4on1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1892

Comment on DOS-2017-0046-0001

Submitter Information

Name: Chris Chato

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-j4vv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1893

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cathrine spencer

General Comment

I wish to oppose the rule change that seeks to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms exports are classified as military under the regulation of the State Department. Congress can block sales of large batches of firearms to foreign countries. If the rule were to change, congress would no longer be automatically informed about large batches of weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns. The transfer of authority would open new floodgates for arms sales internationally, which can add to mounting serious implications for our national security. Therefore, I strongly advocate for serious consideration of not changing our current regulations structure so we can bolster the safety of our country and the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-j5fj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1894

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Russell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We can't even keep our own citizens from using firearms on one another. Why on earth would we want to make it easier to arm the world, just for a buck? Please don't let this insanity move forward.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-j5i8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1895

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Schneider

General Comment

Do not let the NRA push a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business)

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-5qly Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1896

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peggie Jo Vincent

General Comment

I am concerned about a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U. S. State Department (focused on safeguarding our nation to the U. S. Commerce Department (focused on promoting American Business). It would remove a program that carries out inspections. It would remove licensing requirements of brokers, increasing the risk of trafficking. It would remove the State Department's block on the 3D printing of firearms. These are all actions that would contribute to dangers to our democracy and to grave dangers to the lives of people around the world.

For these reasons please do not change the State Department rules that now work to keep us safe. For the protection of our democracy and the protection of our lives, please do not change the current rules for the exporting of semi automatic assault weapons.

Sincerely,

Peggie Jo Vincent

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-jk5o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1897

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Fisher

General Comment

I oppose this change. Don't make it easier to get guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-tv6k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1898

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth McCloskey

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The Commerce Department does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The proposed rule would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. And it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The world does not need any more weapons and the U.S. does not need this rule change. I strongly oppose this proposed rule to change U.S. international arms regulations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-pxnw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1899

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jim Coots

General Comment

I strongly oppose the proposed transfer of authority to regulate international sale of firearms from the State Department to the Commerce Department. This dangerous manouvre will open many doors for terrorists and criminals in other countries all for the sake of profits for domestic gun manufacturers and distributors. Shame, shame, shame on the USA if we move forward on this effort to arm the people of the world. Thankfully, other countries do not have a Second Amendment, and we should help keep it that way.

Thank you.
Jim Coots
Long Beach, CA

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-qn5e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1900

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charmian Tashjian

General Comment

Do not change the rule of arms regulations. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-wcra Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1901

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eileen Soderstrom

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are military goods, they are not commercial goods.

The State Department has the Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Removing the control of the State Department would end this.

The State Department has enabled a block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

With the proposed rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-s2ib Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1902

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rivko Knox

General Comment

I am writing as an almost 80 year old 'never-missed voting in any election' mother and grandmother to let my government know that I oppose the rule transferring oversight of small arms/firearms exports from oversight by the State Department to the Commerce Department. The former focuses on intergovernmental relations to include, for example, the impact of exporting small arms to different parts of the world, e.g., increasing gang violence in several Central American countries with a resulting significant increase in migration from those places to the US. The latter focuses only on how it can help US businesses be more successful. And of even greater concern to me is the fact that this proposed rule eliminates congressional oversight of commercial weapons sales of \$1 or more. Why? Who asked for this change? Could it be related to the decreasing domestic sale of guns (we are saturated) and thus the fact that gun manufacturers are looking to expand sales by selling internationally? That is not bad per se but the State Department could weigh that increase in sales against the negatives caused by such sales to the stability of other nations to include how such weapons could get into the hands of terrorists. The Commerce Department does NOT have that expert or focus.

So, again, I say NOT to this proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-9fxy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1903

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gay Kramer-Dodd

General Comment

I am quite disturbed to learn that our government wants to contribute to greater violence, instability, and war in the world. Yet that is what this rule would do, by moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I can see why the National Rifle Association is promoting this -- they want to encourage more gun sales. But other than arms manufacturers profits, there is only detriment, not benefit, to everyone else.

This rule change would It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In the interest of our national security and the safety of people in the US and all over the world, please reject this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-9641 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1904

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sara DuBois

General Comment

I oppose this rule change that would switch the regulations of the U.S. State department to the U.S. Commerce Department.

Firearms for export are classified as "military". They are . under the regulation of the State Department, and, as such, Congress can block sales of firearms to foreign countries. If this rule changes, Congress could no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns. Meanwhile, the the Commerce Department just does not have the resources or manpower to adequately enforce export controls. There would be far fewer hurdles to obtaining large numbers of firearms traffickers, organized crime, and other violent and dangerous agents.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-9211 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1905

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I DO NOT SUPPORT JEOPARDIZING LIVES & STABILITY FOR THE SAKE OF \$\$\$.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds

of pre-license and post-shipment inspections and publicly reports on them.

- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder

Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged

him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D

printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D

printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-t0j2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1906

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sara Brandon

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

How the rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-r3a8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1907

Comment on DOS-2017-0046-0001

Submitter Information

Name: DAVE VAN DYKE

General Comment

Just what the world needs, more tools to kill each other! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Where is the simple honesty that recognizes the insanity of the motives of the N.R.A.?

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Trump wants to stop Muslims from coming into the U.S. to make us safer. Where then is the logic in exporting weapons to the world?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-jmww Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1908

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dee Matkowski

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-ydq4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1909

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-38sl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1910

Comment on DOS-2017-0046-0001

Submitter Information

Name: DAVE VAN DYKE

General Comment

Just what the world needs, more tools to kill each other! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Where is the simple honesty that recognizes the insanity of the motives of the N.R.A.?

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Trump wants to stop Muslims from coming into the U.S. to make us safer. Where then is the logic in exporting weapons to the world?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-penv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1911

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Tarallo

General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-ognl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1912

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joe Veltri

General Comment

This is insanity! Please don't allow more weapons in this violent world. Think about humanity. I strongly oppose this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-3vr1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1913

Comment on DOS-2017-0046-0001

Submitter Information

Name: DAVE VAN DYKE

General Comment

Just what the world needs, more tools to kill each other! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Where is the simple honesty that recognizes the insanity of the motives of the N.R.A.?

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Trump wants to stop Muslims from coming into the U.S. to make us safer. Where then is the logic in exporting weapons to the world?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-nm72 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1914

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As a United States Citizen I reject the request by the NRA to transfer oversight of gun sales from the State Department to the Department of Commerce

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-11b7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1915

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Singh

General Comment

The sale of firearms should remain under the jurisdiction of the State Department. This agency is better able to protect the safety of American citizens and the well-being of other people in the world. The majority of Americans do not accept the argument of the NRA that we are better off with more weapons in the hands of everyone. Perhaps they argue that case because they are controlled by gun manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-w6av Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1916

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gregg Bragg

General Comment

ENOUGH with the MF guns!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-h0vn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1917

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julia Knight

General Comment

I oppose the firearms rule change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-9abv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1918

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Larson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-snm9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1919

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Pardee

General Comment

Regulation of Export of firearms and other weapons of war should rightfully remain with the State Department, not Commerce. The driving mandate should be for peace and safety, not commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-gqm3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1920

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose relaxing rules to make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, I support saving lives as a priority. Thank you for considering my views.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-ss3l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1921

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Karpinski

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

In addition, this rule change would make the world a far more dangerous place because:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-7ghl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1922

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Thomas

General Comment

I am very much opposed to moving regulation of International Traffic in Arms from the State Department to the Department of Commerce. This belongs in the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-epwg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1923

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jackie Ramirez

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-1ff6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1924

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Losasso

General Comment

Who will gain from switching oversight from the State Department to Commerce? It is not everyday people around the world or in the US. It is the gun manufacturers who want to further profits by making others less safe as a result of ineffective oversight by the Commerce Department that has the objective of increasing sales for certain industries. The proposed change should not fool anyone as to what is going on and this scheme should be firmly rejected.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-w77g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1925

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tina McKim

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Treating international gun sales as a commodity to be ever increased will increase global violence and threaten national security. It would put so many guns into the wrong hands and would be disastrous.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-p39o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1926

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Goodman

General Comment

I oppose this rule. This is insane. It would make it easier for gun manufacturers to export weapons to foreign countries

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-cun9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1927

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marietta Carter

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Here are more details on how the rule change would make the world a far more dangerous place:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-n1sp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1928

Comment on DOS-2017-0046-0001

Submitter Information

Name: janet perlman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department

successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-8web Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1929

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Loudon

General Comment

I absolutely oppose this change. These are weapons of war, and their regulation belongs fully and permanently under the authority of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9437-ugcq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1930

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Lang

General Comment

Firearms and guns should not be available to the worlds citizens without regulation. We have seen the harm it has done in our own country. A major health epidemic. Guns designed for military use have no place in the hands of children, raging adults. This is absolutely ludicrous!

I urge the US State Department to have some common sense and prevent the release of guns into international traffic. Its the equivalent of sending lyons and tigers and poisonous snakes without any trainers or cages.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-34q8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1931

Comment on DOS-2017-0046-0001

Submitter Information

Name: D Bell

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.

- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I strongly oppose this rule change.

Thank you for reading my comment.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-ss0g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1932

Comment on DOS-2017-0046-0001

Submitter Information

Name: M Kirby

General Comment

Please do not proceed with this proposal. Moving the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-5m1r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1933

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

My husband and I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-nnx2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1934

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard C Russell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-ylbv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1935

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sally Shaw

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Arming people in other nations is a matter which should be regulated by those concerned primarily with our safety and security, not by an agency promoting commerce.

Much of the gun-violence around the world is done with American supplied weapons via military sourcing. This too must be curtailed if we want to promote peace. But allowing the sale of firearms to civilians to be overseen by the Commerce Dept. will only exacerbate this violence.

Keep gun exports under the control of the State Department, please.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-sbgy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1936

Comment on DOS-2017-0046-0001

Submitter Information

Name: bonnie kohleriter

General Comment

Please don't switch the regulating of firearms sales from the State Dept. to the Commerce Dept. when it comes to Internat'l sales. The Commerce Dept. doesn't have the safeguards the State Dept. has for trying to get weapons into the hands of those who would use them safely. Thank you Bonnie Kohleriter

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-t7kh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1937

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Roberts-Moneir

General Comment

As long as the export of firearms is under the regulation of the State Department, Congress can block sales of large batches of firearms to foreign countries. A rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department, would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. With a change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have adequate staff available at the multiple locations necessary. Without adequate controls, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The obvious security nightmare such a change would create far outweighs financial benefits to private American weapons manufacturers, and the plan should be not just shelved, but tossed out permanently.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-dth8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1938

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. If a rule change occurs that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business), it would open new floodgates for arms sales internationally, with serious implications for our national security.

Now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the insane rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have the resources or mission to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I vigorously oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I demand that rule change die before human beings do.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-rrnu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1939

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nick Meek

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-8j8d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1940

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanne Hardy

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-9usn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1941

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Morimoto

General Comment

I oppose switching the regulation of firearms exports from the State Department to the Commerce Department. Guns are clearly in a very separate category from other commercial products. Toasters are not used by terrorists, organized crime, or for political violence.

The United States needs to maintain or even increase strict export controls and rigorous enforcement of firearms trade. The proposed change would remove licensing requirements for brokers, resulting in increased firearms trafficking. This will put many more lives around the world in danger from the unscrupulous use of firearms.

This change would also result in the elimination of the State Department's Blue Lantern program, which carries out hundred of pre-license and post-shipment inspections and publicly reports on them.

The oversight of the export of items with clear potential military or illegal use should remain with the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-7e1k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1942

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara coulson

General Comment

Thank you for allowing me to comment on arms sales to despotic countries.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. We should not be approving the actions of countries whose leaders kill their own people, nor should the US arms manufacturers be engaged in war profiteering, which is against the law.

We never seem to learn. Time after time we train and arm despots who turn against the U.S. by using the tactics we taught them and using the weapons we sold (or gave) them. No arms manufacturer should be allowed to profit from actions against our Government.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-y0f2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1943

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Dolley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-hq2i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1944

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ken Koupal

General Comment

Don't allow us to be arms dealers.

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-z7sm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1945

Comment on DOS-2017-0046-0001

Submitter Information

Name: Emma Houseman

General Comment

I feel that regulation of firearms, especially semiautomatic guns and the like, need to remain under the US Department of State. Our countries safety depends on it,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-avns Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1946

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Ulman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-q7pw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1947

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

To whom it may concern - as a U.S. resident in the state of Texas, I oppose this rule change that would enable gun sales to other countries. Our own current state of gun mania and lax regulations is killing too many young Americans, we have a moral obligation not to perpetuate this problem in other countries for the sake of corporate greed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-3maz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1948

Comment on DOS-2017-0046-0001

Submitter Information

Name: angelo sturino

General Comment

it is imperative that both society and all sectors too to come to terms of the gun violence that is tearing the core to fragments of our values and democratic society. There is a need to study all levels of society , all levels of education, all levels that measure the core areas of violence Our 2nd amendment assures every US citizen the right to bear arms that is both historical and means more today. However, there is a call for commonsense legislation to assure the above and safety and violence of our US citizens..... What better way to celebrate on this Fourth of July, America's independencethank you.....

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-ji2x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1949

Comment on DOS-2017-0046-0001

Submitter Information

Name: Terence Travis

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

That is why I adamantly oppose changing the rule that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. If this rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep illegal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-bfuv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1950

Comment on DOS-2017-0046-0001

Submitter Information

Name: Libby Schovajsa

General Comment

This change would make our country and the world more dangerous for all of earth's inhabitants. Please do allow the restrictions on firearms to be loosened. We need more regulations, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-y41i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1951

Comment on DOS-2017-0046-0001

Submitter Information

Name: DeeDee Tostanoski

General Comment

I strongly oppose the removal of international arms regulation from the State Dept to the Commerce Dept. State is in the unique position to evaluate the international impact of arms sales to particular individuals and areas of the world, as well as to identify likely bad actors in this exchange. Arms dealers around the world have been contributing to making the world a more dangerous place, and State has been able to limit some of that impact. The mission of the Department of Commerce is to promote commerce, not to secure the safety of the world's citizens. This shift in responsibility is ill-advised and will have dangerous repercussions.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-86cv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1952

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joel Trupin

General Comment

We don't need guns. They are harmful to our country and to other countries to whom we sell them. The claim that the 2nd Amendment protects gun ownership is erroneous. It was written in 1791 and applied to militia, which are no longer our means of defense. The gun manufacturer's lobby, the NRA, has generated political pressure to defeat laws regulating gun ownership, thereby creating serious social problems in the U.S., from a high incidence of gun deaths to crime, racism and drugs. The political will to defeat the NRA and institute regulation of gun sales and ownership is on the horizon. If our politicians don't take action, our youth will.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-6uxz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1953

Comment on DOS-2017-0046-0001

Submitter Information

Name: LTC (ret.) Jose Cruz

General Comment

I condemn this in the strongest possible manner. There is NO reason for the State Department to abdicate this responsibility, which helps keep US secure. Transferring this authority to the Commerce Department, which is only interested in making profits for corporate America, even if it results in mass slaughters in other countries as we see in the US today, is abominable. DO NOT PROCEED WITH THIS TRANSFER OF AUTHORITY!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-4tih Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1954

Comment on DOS-2017-0046-0001

Submitter Information

Name: Seren Bradshaw

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns, especially military-grade weapons, need to be strictly controlled and not be used solely as a source of commercial revenue. Put me down as a NO vote on this proposed rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-oxr8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1955

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Randall

General Comment

To whom it may concern,

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department for the following reasons.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Switching the regulation of firearms exports from the State Department to the Commerce Department insures the world will be a far more dangerous place because this action would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would also eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would increase the risk of trafficking by removing licensing requirements for brokers,.

It would also remove the State Departments block on the 3D printing of firearms. This would make it possible for anyone with access to a 3D printer, anywhere around the globe, to produce a lethal weapon. When Defense Distributed founder, Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws. This rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you for your consideration & time.

Respectfully yours,
Margaret Randall

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-h3uj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1956

Comment on DOS-2017-0046-0001

Submitter Information

Name: Henrietta Wise

General Comment

FORBID ALL IMPORT AND EXPORT OF ANY KIND OF GUN TO OR FROM ANYWHERE IN THE WORLD!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-9a0s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1957

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elliot Daniels

General Comment

I oppose the proposed rule to transfer authority for export control licensing of firearms from State Dept/ITAR to the Dept of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-syh6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1958

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Herzfeld

General Comment

Increasing international sales of guns will just increase violence in receiving countries and drive more refugees to our borders. Don't we have enough of that already?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-2qoz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1959

Comment on DOS-2017-0046-0001

Submitter Information

Name: Meredith Faltin

General Comment

Please make guns less, not more available!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-irc7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1960

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alisheba Hurwitz

General Comment

I oppose this rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department. This rule will remove safeguards against dangerous arms deals.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-okxu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1961

Comment on DOS-2017-0046-0001

Submitter Information

Name: George Fuller

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or

broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-6qoa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1962

Comment on DOS-2017-0046-0001

Submitter Information

Name: Henrietta Wise

General Comment

Call any sale or passage of any form of gun or guns to or from anywhere in the world to or from anywhere in the world a "weapon" or "weapons" and forbid the passage of that gun or guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-xnn2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1963

Comment on DOS-2017-0046-0001

Submitter Information

Name: LK WOODRUFF

General Comment

Short version:

The NRA is currently the USA's public enemy #1.

They are even more destructive than the Trump regime.

And now they plan to expand their diabolical mission worldwide.

NO!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-rjrq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1964

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the transfer of authorization of export sales of firearms from the US State Dept to the US Commerce Dept, this is a dangerous and reckless policy ...the State Sept should always have authority and discernment regarding any weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-hnfq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1965

Comment on DOS-2017-0046-0001

Submitter Information

Name: J PR

General Comment

Do NOT make the switch from arms control being in the hands of the U.S. State Department to the U.S. Commerce Department. The State Dept is better suited to oversee the protections of US citizens whereas the Commerce Dept has the desires of gun manufacturers and promoters at the fore. We need FEWER guns not MORE. We need GREATER oversight and protections not LESS!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-jrfu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1966

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Cavanaugh

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-txie Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1967

Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Moulden

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-bcoh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1968

Comment on DOS-2017-0046-0001

Submitter Information

Name: kristin carstarphen

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-w3yi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1969

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Ann and Frank Graffagnino

General Comment

Dear Sir/Madam,

My husband and I are very concerned and strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Simply put, the NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

We support the fact that right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

More specifically, we strongly oppose this rule change for the following reasons:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

So for all the above reasons, IT IS THE RIGHT, FAIR, JUST, HUMANE AND HEALTHY ACTION TO oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!!!!!!!!!!!!

Sincerely yours,
Mary Ann and Frank Graffagnino
Tucson, AZ

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-1vmc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1970

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ruth Sheldon

General Comment

Please, please, please do not make this rule change. It is bad for everyone except those who profit from gun sales and they profit too much already.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9438-6nn2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1971

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

this should be unconstitutional due to the liabilities to our own military abroad and us police agencies involved with the heroin trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-lj0r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1972

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Songalia

General Comment

Firearms exports must continue to be classified as military. They must remain under the regulation of the State Department so Congress can block sales of large batches of firearms to foreign countries.

I am opposed to switching the regulation of firearms exports from the State Department to the Commerce Department because this change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The State Departments Blue Lantern program must not be eliminated.

Licensing requirements for brokers must not be eliminated.

The State Departments block on the 3D printing of firearms must not be eliminated.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-rz1p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1973

Comment on DOS-2017-0046-0001

Submitter Information

Name: Craig Coulter

General Comment

I oppose this new action. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please consider all of this and deny the proposed rule.

Sincerely,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-ix9y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1974

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nydia Leaf

Organization: Granny Peace Brigade

General Comment

To the U.S. State Department - To Whom It May Concern:

My family and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a matter of national security - we must not and cannot permit any change that will open the floodgates of weapons trading.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-9s51 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1975

Comment on DOS-2017-0046-0001

Submitter Information

Name: Edward Rengers

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-5xws Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1976

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Edelstein

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-jl7y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1977

Comment on DOS-2017-0046-0001

Submitter Information

Name: randall potts

General Comment

I strongly oppose the Rule change in International Traffic in Arms Regulation. This is a terrible change to longstanding and effective regulation of international arms sales from the USA that will not only harm our standing in the civilized western world, but also help arm the worst war criminals who oppress their own people.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The only beneficiaries of this rule change are gun manufactures, arms dealers and the vermin they arm. This makes the USA less safe and compromises our moral standing and values. This change is totally against the interests of USA citizens. Please do not do it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-9fo1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1978

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lois Feuer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The rule change would make such sales a matter of money rather than one of national/international defense and security. We do harm to our own and other nations when we supply deadly weapons to terrorists and lawless governments.

This kind of sale alienates law-abiding nations (of which we should be the leader), betrays international agreements, and foments violence around the world.

For these reasons I oppose the change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-sxhv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1979

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Kent

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-doug Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1980

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cornelia Shearer

General Comment

I have recently learned that not only are there a gut of all kinds of guns in the U. S., but drug smugglers are bringing guns across the border into Mexico contributing to the violence of the gangs there that keep that country in a state of semi warfare with the citizens.

We desperately need to find ways that decrease the huge number of guns available in the U.S. The second amendment does not say that each citizen has the right to act as though they are an independent militia.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-233c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1981

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ireri Bravo

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-1a86 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1982

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karl Hamann

General Comment

I am completely opposed to the NRA's shameless bid to flood the world with US made weapons. Moving the authority for weapons sales to the Dept. of Commerce is a cynical ploy, and must not stand!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-rpgx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1983

Comment on DOS-2017-0046-0001

Submitter Information

Name: William 'Skip' Dykoski

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-88nn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1984

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca tippens

General Comment

Please do not move from the state department oversight of arms' shipments:

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Changing the process would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-rf2f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1985

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Duerksen

General Comment

I oppose moving the regulation of firearms exports from the Department of State to Department of Commerce. This change would make the world a more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-y97c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1986

Comment on DOS-2017-0046-0001

Submitter Information

Name: leora douraghy

General Comment

I oppose the rule change to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Under the State Department, the sale of weapons is strategic, under the Department of Commerce the sale of weapons would be horrific, turning a once benevolent Uncle Sam into a merchant of death.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-bm3r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1987

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pennie Heath

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-4ss2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1988

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary-Beth Santarelli

General Comment

PLEASE DO NOT MAKE IT EASY FOR PEOPLE OUTSIDE THE USA TO GET AMERICAN GUNS AND AMMO. THESE WILL ONLY BE USED AGAINST USAND ALSO TO HARM OTHERS.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-a494 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1989

Comment on DOS-2017-0046-0001

Submitter Information

Name: robin waterhouse

General Comment

no assault rifles, no automatic rifles
no need for peons to have them. i am sure the preppers have alot.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-zq5b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1990

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy O'Byrne

General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I oppose this proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-zief Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1991

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl Pressgrove

General Comment

We have enough gun violence in our country without exporting it to others. We have immigrants fleeing violence in their countries and seeking asylum in the US. Greed should not dictate our moral obligations to our fellow man/womankind!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-eyj4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1992

Comment on DOS-2017-0046-0001

Submitter Information

Name: Adina Parsley

Organization: none

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Leave firearm export regulations with the State Department whose primary interest is national security and not with the Commerce Department whose primary interest is promoting American business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-wnln Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1993

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Scarabin

General Comment

Congress should not let this type of BS be passed for a corporation of death (NRA & corporations making these killing machines).

This is all about making money for political gain, again STOP the BS!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-mi0y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1994

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Rose

General Comment

It is essential that the U.S. Department of State continue to review sales of firearms to overseas buyers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-t5s4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1995

Comment on DOS-2017-0046-0001

Submitter Information

Name: Concerned Citizen

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would make the world a more dangerous place and increase the number of firearms thereby increasing crime and adding to the unsafe conditions that can cause increased migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-2329 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1996

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rita Raftery

General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I oppose the rule change.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-z1z4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1997

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Gregory

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-5d3b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1998

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Starr

General Comment

i oppose this rule change that would switch the supervisory group over gun sales from the State Department to the Commerce Department!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-2qlr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-1999

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patrizia Lazzeri

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

To keep ALL Americans safe, this MUST never be allowed to happen!! Thank you!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-wmdn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2000

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Miller

General Comment

I am writing to express concern with the proposal to change the regulation of arms exportation from the State Dept to the Commerce Dept. I have always felt shame that the US is responsible for more exportation of weapons to all parts of the world than any other country. Many times it is clear we have actually armed both sides of a disagreement and we have armed our own enemies. We should promote conflict resolution and not violence. Moving control of munitions export to Commerce just makes it abundantly clear that our own motivations are profit and not safety, diplomacy or democracy. Please oppose this proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-dckv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2001

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alicia Shapinsky

General Comment

I oppose this rule change switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Such a switch would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms exports should remain under the regulation of the U.S. State Department. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-y9lr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2002

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Cato

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The rule change would make the world a far more dangerous place: It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Right now, firearms exports are classified as military under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to enforce export controls adequately. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9439-6cfg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2003

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles Tucker

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This switch would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. The rule change would make the world a far more dangerous place!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-wro7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2004

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jacqui Lipschitz

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-6mmo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2005

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-wxv8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2006

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Heidemann

General Comment

I strongly feel the regulation of export of firearms from the US should stay within the State Department where there are resources to track and follow and intercept if necessary any weapons that are exported from the US.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-b4p6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2007

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marney Reed

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-5khq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2008

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rose Catania

General Comment

I vehemently DO NOT agree with the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This is a dangerous proposal, as It would eliminate the State Departments Blue Lantern program on inspections and reports.

It would also remove licensing requirements for brokers, increasing the risk of trafficking tremendously. DO NOT CHANGE THE RULE.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-t5se Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2009

Comment on DOS-2017-0046-0001

Submitter Information

Name: Glen Kappy

General Comment

I understand there is a proposed rule change that would take the regulation of U.S. firearms exports from the U.S. State Department and put it under the U.S. Department of Commerce. If true, I strongly oppose this change.

Thank you for the opportunity to comment and for your attention to this matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-yu9e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2010

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Carpenter

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It's quite obvious that this rule change is simply a blind to bring more firearms into the U.S., and we definitely do not need more assault type weapons in the hands of civilians. There have been enough deaths and misery caused by assault weapons and the mentally ill or terrorists who were able to buy them. Please do not allow this rule change to go through.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-pe0i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2011

Comment on DOS-2017-0046-0001

Submitter Information

Name: Douglas Sedon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-ko6c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2012

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christopher Fite

General Comment

We should not have the NRA, and U.S. gun manufacturers, selling guns outside this country. Too often, these guns end up being used in wars around the world. You think fireworks on the 4th of July are dangerous? They are nothing compared to the killing and destruction of wars, which are aided when the NRA, and U.S. gun manufacturers are selling guns to foreign governments and private individuals in other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-fnqp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2013

Comment on DOS-2017-0046-0001

Submitter Information

Name: Chris Saia

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Changing any of these rules, at this point, would be bat-shit crazy.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-4f54 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2014

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike Vanlandingham

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-xvxx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2015

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Johnson

General Comment

<https://action.momsrising.org/go/38288?t=9&akid=11004%2E2168612%2EHaA8pT>

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-oqb3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2016

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sylvie Stevenson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

S.M. Stevenson
2002 E. River Road
Unit N-07
TUCSON, AZ 85718

US Citizen

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-glqo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2017

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rita Carter

General Comment

I oppose the rule changes to International Traffic in Arms that would allow less weapons sales monitoring and control.

Since firearms exports are now classified as military and are under the regulation of the State Department, then Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-df2p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2018

Comment on DOS-2017-0046-0001

Submitter Information

Name: RJ Cooper

General Comment

Limit arms exports. Do not move jurisdiction to Commerce! If that is done, almost anyone, anywhere can purchase military grade weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-rcgi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2019

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stuart Rayvid

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-nfj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2020

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Morse

General Comment

No, don't do it! I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It should be a crime to ship guns overseas.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-woh1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2021

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change! Dept. Of Commerce has no
Place being in charge of gun sales, especially internationally. It needs to remain as is.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-5p95 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2022

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Brown

General Comment

Moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business) would open new floodgates for arms sales internationally, with serious implications for our national security.
Please do not make this change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-9f73 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2023

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin Hayes

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-qopp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2024

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Perry

General Comment

I strongly oppose rule change to allow control of firearm sales internationally from State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-tw5j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2025

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ginny Mitchell

General Comment

All guns or any kind have only one purpose, to kill. I have lived for 70 years and have never needed a gun to protect myself. The only people I would need to protect myself from are those with guns. Duh! Why do we need all this killing? To line the pockets of the NRA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-ewd5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2026

Comment on DOS-2017-0046-0001

Submitter Information

Name: paul runion

General Comment

i oppose the rule change which would switch the regulations of firearms export from the U.S. Dept. of State to the U.S. Dept. of Commerce

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-3i35 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2027

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janelle Murphy

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-imkl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2028

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Prostko

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943a-l3hj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2029

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Waterman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-7fn4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2030

Comment on DOS-2017-0046-0001

Submitter Information

Name: patrice schooley

General Comment

I oppose this rule change that would switch the regulation of firearms export from the United State Department to the US Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-mq0l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2031

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-fyxv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2032

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Nelson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-4xry Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2033

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Vieira

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

We would be fools to allow weapons to be sold on the international markets. This could be used by terrorist organizations as a means to arm large numbers of combatants hell bent to create havoc and kill innocent people.

This is another NRA scheme to increase the sales of weapons by the gun manufacturers.

The NRA is a disreputable advocacy organization and is responsible for the gun violence in our country and should not be carried any favors.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943b-ouhw
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2034

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Knoll

General Comment

As a citizen of the United States, I am very concerned about gun violence and our exporting of this violence by selling guns to other countries. I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.
5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-

shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.

Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

7. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-9aze Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2035

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Tuttle

General Comment

I am writing to strongly oppose this rule change that would switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.

This rule change has the potential to harm both national security and international human rights. For example, with the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department simply does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large quantities of American guns and ammunition.

Thus, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would be dangerous and irresponsible, and must not go forward.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-a1jw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2036

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lois Klepin

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-upqi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2037

Comment on DOS-2017-0046-0001

Submitter Information

Name: Miriam McCaleb

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-bezg Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2038

Comment on DOS-2017-0046-0001

Submitter Information

Name: toby kutler

General Comment

I cannot understand why the U.S. Department would even consider international traffic in arms regulation: U.S. Munitions list categories.

I cannot understand why the U.S. Department would even consider international trade in arms regulation. Why this dept even think of doing such a terrible thing ..Iam begging for sake of everyone. No NO No NO NO

[illegible]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-w4rr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2039

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Miranda

General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List. They are very dangerous guns. AK-47s have been involved in human rights abuses. I strongly oppose reclassifying semi-automatic weapons as commercial items. Please keep AK-47s on the State Department's US Munitions List.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-z851 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2040

Comment on DOS-2017-0046-0001

Submitter Information

Name: Petra Barclay

General Comment

I strongly oppose the rule change. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-pqwr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2041

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-i12y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2042

Comment on DOS-2017-0046-0001

Submitter Information

Name: brian faleiro

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-paql Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2043

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Blum

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. It seems your department is forgetting that immigrants are entering America through its southern border requesting asylum from their home countries due to gang violence. Remember these gangs and other violent people are receiving their guns from America more often than from any other country. Hence, the only reason for more easily allowing guns made in America to be shipped across its border is because there is no perceived threat to America's border security by your department. If that is so then I fully expect your department to declare that there is no increased security threat to America's southern border and to vigorously denounce any actions to increase funding for border security, including for more personal or for building more walls on America's southern border.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-56w0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2044

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the change from State Dept to Commerce Dept.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them

It would remove licensing requirements for brokers, increasing the risk of trafficking

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-cqj0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2045

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cindy Kuenzi

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The firearms we export will likely be used against our citizens or our allies abroad. Enough.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-iagy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2046

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pat Wolff

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-sifp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2047

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robin Patten

Organization: none

General Comment

Are you seriously going to make it easier for gun manufacturers to sell and ship firearms all over the world? They already send countless firearms around the world, please don't make it any easier.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Please don't make the world more dangerous than it already is.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-jfch Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2048

Comment on DOS-2017-0046-0001

Submitter Information

Name: James & Leslea Kunz

General Comment

The world does NOT need more guns for public consumption, but many fewer. Why not assist non-European countries world-wide remove guns and make them illegal in public places??!?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-dphz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2049

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Wiant

General Comment

the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-2rez Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2050

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aaron Tovo

General Comment

If you sell arms to others countries you can only expect (more) blowback.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-6h4s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2051

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jim Snee

General Comment

I oppose this rule change. It removes these gun sales from the protection of National Security to that of promoting business.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943b-5tcl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2052

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alison Dillemath

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-svuw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2053

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Reed

General Comment

I oppose the rule change that was switched the regulation of firearms export from the United States state department to the United States Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-sq62 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2054

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betiana Caprioli

Organization: Dream Realized Scholarship

General Comment

I oppose the rule change that will allow sales of firearms to oppressive government.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-v1id Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2055

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ken Koenigshofer

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I ask that the State Department and the Commerce Department oppose the rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-fj66 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2056

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cathy Marczyk

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-egld Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2057

Comment on DOS-2017-0046-0001

Submitter Information

Name: Valerie Leonard

General Comment

I am writing to express my opposition to switching the regulation of firearms exports from the State Department to the Commerce Department. I believe this would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I think this change would make the world a far more dangerous place and here are my reasons why:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

1. It would remove licensing requirements for brokers, increasing the risk of trafficking.

3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not make this change.

Thank you,

Valerie Leonard

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943c-g2qp
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2058

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I live in Lebanon, Oregon and am a member of the United Church of Christ, which is active in peace and justice issues. I have gone on several trips to Latin America, and this past April I was part of a Witness for Peace delegation that traveled to Mexico and spent 10 days in Oaxaca and Mexico City. We talked to several people representing indigenous groups and others who face violence and repression on a regular basis. One common theme we heard was that the perpetrators of violence are using weapons obtained from the U.S., either legally through the Merida Initiative, or illegally by smuggling arms across the border. Arms used in crimes have been traced back to U.S. manufacturers through their serial numbers. Once the arms reach Mexico there is little oversight of their distribution, and they wind up in the hands of armed militias, secret security forces and cartels. The result is that Mexico has one of the highest homicide rates in the world. For the safety and security of the Mexican people, Mexico needs fewer arms, not more, and more control on the guns sent there, not less control.

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. Regarding wide retail availability of firearms, about which comment has been requested, many countries, including Mexico, prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Treating semi-automatic assault rifles as non-military would only increase the number of these deadly arms reaching local police forces, who are supposed to protect civilians, not assault them. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Human rights abuses in Mexico are not well-known outside the country and eliminating Congressional oversight would make it more difficult to identify the abusers. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items

moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

3. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

4. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. Knowing the total amount of firearms deliveries is important in examining the relationship between the number of guns and the amount of violence in a country.

5. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Leave the regulation of firearms and ammunition under the State Department.

Sincerely,

Kenneth Crouse

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-5izh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2059

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike Lundgren

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-xqad Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2060

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jay Mullings

General Comment

I am opposed to this rule change.

Anything that make more semi automatic weapons, means more dead people.

Keep the situation as it is.

This change would count on gun manufacturers
to tell th gvt about huge shippments of AR-15 to Turkey,
the mfg. would not tell & Kurds would be killed.

NO easing exports of weapon w/o congress in every instance.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-gm5i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2061

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marjel Zaldivar

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. This is not just an issue about business. People's safety, and ultimately, America's safety are on the line.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-gwrs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2062

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Sheeler

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-l7uo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2063

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathe Garbrick

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

This would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-2fui Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2064

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jerry Nailon

General Comment

comments now to the State Department and the Commerce Department through the below links. You can write in something like: I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-xrs9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2065

Comment on DOS-2017-0046-0001

Submitter Information

Name: Helen Dickey

General Comment

This proposal to move the authority to regulate guns from the State Department to the Commerce Department , is so terribly wrong it is scary. The Commerce Dept does not have the manpower to oversee this big an operation, nor does it have the training. This is so typical of the NRA and would do so much damage to our security in this country, and in the whole world. Please do what you can to see that this does not happen.

Thank you,

Helen Dickey

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-cljr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2066

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Jo Baumann

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous! They are used to kill people every day around the world in acts of terrorism, organized crime, political violence and human rights violations. They should be subject to more controls, not less. The Commerce Department does not have the resources to adequately enforce export controls!

This rule change would remove essential safe safeguards that help keep extra-legal agents from obtaining the weapons that fuel violence that destabilizes countries and causes mass migration.

Please do the right thing and forgo this disastrous rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-gh2v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2067

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Stern

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-c057 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2068

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lewise Busch

General Comment

Dear sir or madame:

I want to protest vigorously any plans to switch the regulation of firearms exports away from the State Department to the Commerce Department. The latter is clearly not equipped to assess the potential impacts of firearms sales to nations where there are rampant civil rights abuses, drug cartel operations, political violence, or just plain high rates of violence. State is much better equipped and focussed to concentrate on our security and the reduction of violence fueling the high rates of mass immigration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Thank you for considering my thoughts about this!

Sincerely,

Lewise Busch

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-57cb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2069

Comment on DOS-2017-0046-0001

Submitter Information

Name: karen kindel

General Comment

Switching regulations of firearms export from US State Dept to US Commerce Dept is a terrible idea. After all the gun tragedies, how can this even be considered. It would increase arms sales internationally and impact national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-uh5z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2070

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Pinches

General Comment

Please don't change the regulations! Thank you!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-3qp8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2071

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Phelps

General Comment

I am a registered gun owner and I oppose placing the export of firearms under the aegis of the Commerce Department. They are correctly classified as military and belong under the purview of the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943c-ijgu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2072

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carlos Cabezud

General Comment

Please do not turn over the regulation of firearms exports to the Commerce department; let the State dept.continue to handle it.

Letting Commerce do this could lead to huge quantities of firearms winding up in the hands of countries which constantly violate human rights.

Sincerely,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-woax Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2073

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marguerite Benoit

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-bfcx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2074

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Albanese

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S.State Department to the U.S. Commerce Department.

Once the almighty dollar is involved, morality & common sense go out the window.

Thank you for your time & consideration in this matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-efyb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2075

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Bachman

General Comment

I object to the international trade in firearms shifting from the Department of State to the Commerce Department. We need to keep control of where the arms and what type of arms are going, what they will be used for, and whether the use is consistent with US values. The Commerce Department is charged with selling the US commerce, not in making value judgements on our exports. Do not transfer our arms sales to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-1fyi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2076

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Kronheim

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

The public comment period for this rule change ends on July 9.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations, and suicides. They should be subject to more controls, not less!

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-hdyi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2077

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jan Sockness

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-yrwe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2078

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Gliva

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-6ba6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2079

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vicky Matsui

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-kyzb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2080

Comment on DOS-2017-0046-0001

Submitter Information

Name: michael cunningham

General Comment

I think that regulations on arms and us munitions should be kept at the StateDept. So they can control the licensing of US made arms to keep them from being exported to the WRONG people or countrys .
michael cunningham

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-a2nf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2081

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Seidel

General Comment

Please do not remove the control of selling guns overseas from State Dept and move it to the Commerce Dept.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-lbwa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2082

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeanne Hogan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not want to see firearms exported to oppressive regimes, removal of safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and do not want to further & fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-msc1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2083

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Bryce

General Comment

I oppose the proposed rule change that would shift international firearms traffic regulation from the U.S. Department of State to the U.S. Department of Commerce. Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-s73w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2084

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dorelle Ackermann

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-dowq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2085

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dorelle Ackermann

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943d-pq57 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2086

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deb Hahn

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-e95e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2087

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlana Santoyo

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-ugk7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2088

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marie braga

General Comment

Please don't spread the sale of guns internationally. Stop the madness just to make money!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-l3j7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2089

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Matthews

General Comment

Please do not change the control of sale of firearms from the State Department to the Department of Commerce. Firearms exports should be continued to be classified as military", so that Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Unacceptable!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-v557 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2090

Comment on DOS-2017-0046-0001

Submitter Information

Name: ellen kabat

General Comment

I oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-p1vm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2091

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Castellanos

General Comment

Please leave the handling of firearms/munitions licenses under the State department and not under the commerce department since I believe its in the best interest of our safety. Lets keep money interests out of safety interests.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-u884 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2092

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Ann Fleming

General Comment

I oppose giving the Commerce Department jurisdiction over firearms sales. Because of national security, this needs to remain with the State Department. Hopefully this would allow decisions to not be subject to the firearms manufacturers desire for profits at the expense of national safety.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-dra3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2093

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ernest Isaacs

General Comment

Here is how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Please reject this terrible change

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-kqlz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2094

Comment on DOS-2017-0046-0001

Submitter Information

Name: Virginia Lee

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls.

Its Bureau of Industry and Security does not have staff everywhere.

This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like

organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous.

They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

They should be subject to more controls, not less!

A July 5, 2017, article in the Proceedings of the National Academy of Sciences identifies that Earth is in the midst of its sixth mass extinction episode: Biological annihilation via the ongoing sixth mass extinction signaled by vertebrate population losses and declines.

The article concludes: "...Earth's sixth mass extinction episode has proceeded further than most assume. ... (T)he proximate causes of population extinctions (are): habitat conversion, climate disruption, overexploitation, toxification, species invasion, disease, and (potentially) large-scale nuclear war ... (T)he ultimate drivers of those immediate causes of biotic destruction (are), namely, human overpopulation and continued population growth, and overconsumption, especially by the rich. ... (T)he sixth mass extinction is already here and the window for effective action is very short, probably two or three decades at most. All signs point to ever more powerful assaults on biodiversity in the next two decades, painting a dismal picture of the future of life, including human life."

<https://www.pnas.org/cgi/doi/10.1073/pnas.1704949114>

Fascism, a governmental system run by a dictator, exalts the state and race above the individual.

Fascism enforces severe economic and social regimentation.

Fascism enables mega-businesses / wealthy economic predators who support the dictator to profit from exploiting / harming / enslaving / killing scapegoats -- the "other."

Fascism creates special privileges for its wealthy supporters -- in this case weapons dealers and the NRA, both of whom contribute inordinate dark money to the Republican majority in Congress and the current occupant of the White House.

Does the U.S. Department of State want to accelerate Earth's sixth mass extinction episode with a world-wide blood bath that enriches U.S. arms dealers and the NRA?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-viy0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2095

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica R Semon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would endanger human lives, including those of US citizens.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-f304 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2096

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Ross

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is unacceptable and should not be allowed so that the NRA and gun manufacturers can sell more arms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-u3q8 Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2097

Comment on DOS-2017-0046-0001

Submitter Information

Name: Glen Anderson

General Comment

I STRONGLY OPPOSE Trump's proposal to move export license oversight for firearms from the Department of State to the Department of Commerce THAT WOULD PROMOTE TERRORISM by making firearms seem like just another commercial commodity for the Dept. of Commerce to rubber-stamp.

The Dept. of State knows what's going on in other countries, so the Dept. of State should continue its oversight power.

Trump's proposed rule change treats semiautomatic assault rifles as non-military. WHAT BALONEY!!!!
U.S. troops routinely use their military rifles in semiautomatic mode.
Foreign militaries and TERRORISTS use them.
TRUMP WANTS FOREIGN DICTATORS AND TERRORISTS TO GET EASIER ACCESS TO GUNS!!!!!!!!!!!!!!!!!!!!

The proposed rule also eliminates Congressional oversight for important gun export deals. WE NEED OVERSIGHT!

The rule IMPOSES COSTS UPON TAXPAYERS that gun manufacturers should pay (costs of processing licenses).

The rule allows unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

PROTECT HUMAN RIGHTS!!!! PREVENT TRUMP FROM ARMING TERRORISTS!!!!

STOP THIS INCREDIBLY RECKLESS AND STUPID RULE!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-8ajv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2098

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Multer

General Comment

This is a horrendous idea ! After watching countless attacks on students and other groups of innocent people, how can this even be considered? It is a totally bad idea.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-29wx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2099

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nicole Taylor

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Dept. to the U.S. Commerce Dept. because it would undermine the safety of the United States and its citizens. The Commerce Dept. cannot appropriately keep guns out of the hands of gun traffickers, terrorists, or human rights abusers, among others.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-quc0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2100

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Hicks

General Comment

I am writing against the proposed rule change to switch the regulation of firearms exports from the State Department to the Commerce Department. This change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

More specifically, the rule change would weaken the control of arms shipments by doing the following:

- 1) eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them;
- 2) removing licensing requirements for brokers, increasing the risk of trafficking; and
- 3) removing the State Departments block on the 3D printing of firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943e-1jch Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2101

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dianne Wells

General Comment

Transferring export license authority for firearms from the State Department to the Commerce Department would enrich gun manufacturers at the expense of our national security. I oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-ijm1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2102

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Kruckemeyer

General Comment

I am absolutely opposed to the proposed rule change to transfer regulation of gun export from the State Department to the Commerce Department.

This is a matter of national and world security before it is a business matter, and it is the State Department, not Commerce, which has the resources to control this highly sensitive matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-f7ic Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2103

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maurine Canarsky

General Comment

I am writing to strongly and vehemently oppose the proposed rule change.

Switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

This rule change eliminates the Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It removes licensing requirements for brokers, increasing the risk of trafficking.

It removes the block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Do not make this change. It opens the door to more violence and death worldwide.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-3pz4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2104

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betty Chernansky

General Comment

I oppose the rule that would switch the regulation of fire arms export from the State Department to the department of Commerce. switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-n3e6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2105

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jesus Bustos

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department for I think this would open the flood gates to fire arms around the world
There is no good reason to make this change other then to aid an industry that has little regard for the finality of it's product and will have serious repercussions that would not be understood until it's too late. Again I ask the department please use all it's resources to oppose this move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-55w9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2106

Comment on DOS-2017-0046-0001

Submitter Information

Name: MARIA BRUSCHI

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-7ut3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2107

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Suellentrop

General Comment

I oppose this rule change to switch from the State Department to the Commerce Department the regulations on US munitions. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-456g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2108

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deadre Lorber

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943f-8ovn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2109

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Spencer

General Comment

I oppose transferring the regulation of firearms exports from the State Department to the Department of Commerce. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The proposed rule change would make the world a far more dangerous place because: It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. This rule change would make not only the United States, but every country in the world much less safe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-vwl2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2110

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenneth Loehlein

General Comment

I oppose the transfer of firearms exports from the U.S. Dept. of State to the U.S. Dept. of Commerce. It is better for the safety and security of the United States that firearms exports stay with the U.S. Dept. of State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-gdrj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2111

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cassandra McDougall

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-e04d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2112

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Stephenson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-fyy4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2113

Comment on DOS-2017-0046-0001

Submitter Information

Name: Theresa Hadden-Martinez

General Comment

This rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department is a terrible idea and I oppose it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-nqgz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2114

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Dour

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-2bw7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2115

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rita Novak

General Comment

I oppose the transfer of regulatory power over automatic weapons from the State Department to the Commerce Department. Such a change will reduce the check on the sale of dangerous weapons to the hands of authoritarian regimes and criminals. The State Department has a better ability to take into account interests of the United States foreign policy and values than the Commerce Department does.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-wbly Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2116

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Uyenishi

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Thank you for listening

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-e8sn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2117

Comment on DOS-2017-0046-0001

Submitter Information

Name: jennifer schultz

General Comment

This is one of the worst ideas that the government has ever come up with. Selling semi-automatics to other countries just encourages despots and dictators to use violence to take away rights of those people who are trying to gain freedoms that we have in the united states. This proves how influential the NRA is by using money to influence politicians that are in congress. This is not what the united states is about. The united states is supposed to encourage other countries to set up democracies throughout the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-tbnf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2118

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Rogan

General Comment

I can think of no greater danger to the world and its peace than for the United States to treat the world as simply one gigantic single-person gun market. Somebody apparently thinks that an armed society is a polite society, and has forgotten South Sudan and Ethiopia.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-r1lx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2119

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Rogan

General Comment

I can think of no greater danger to the world and its peace than for the United States to treat the world as simply one gigantic single-person gun market. Somebody apparently thinks that an armed society is a polite society, and has forgotten South Sudan and Ethiopia.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-hyn0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2120

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Dempsey

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-fpxv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2121

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angela Kelly

General Comment

I am entirely opposed to any rule change that would declassify firearms as military and/or that would result in a change of the regulation of firearms exports from the U.S. Department of State to the U.S. Commerce Department. This proposed change would dramatically endanger our national and international security.

The safeguards that are in place, including the Blue Lantern program, licensing and inspection policies, a block on the 3D printing of firearms, along with congressional and public oversight that exists because the U.S. Department of State oversees the export of firearms cannot be underestimated in our global security.

It is important to keep the regulations of firearms within the jurisdiction of the U.S. Department of State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943g-s60n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2122

Comment on DOS-2017-0046-0001

Submitter Information

Name: Agnes Franklin

General Comment

It's vitally important that we don't make weapon sales easier for citizens or for other countries to buy. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-ev3g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2123

Comment on DOS-2017-0046-0001

Submitter Information

Name: Yousong Mei

General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-gy20 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2124

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dian Lopez

General Comment

Export licenses for powerful firearms should be handled by the state department not the commerce department. The object is NOT to make more money but to protect our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-psri Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2125

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marlene Kopplin

General Comment

This is a really bad idea changing gun control to the commerce department. Making it easier to sell guns around the world. This smacks of greed for the almighty dollar. Vote NO on this,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-39pu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2126

Comment on DOS-2017-0046-0001

Submitter Information

Name: Evan Ingle

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-tolu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2127

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Walp

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms regulation must be fully funded, and the State Department already has many mechanisms in place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-xa9a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2128

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charles TOLL

General Comment

I strongly oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

At present, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security, and for the security of numerous nations around the world.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This would be an extremely wrong-minded and harmful change.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place. Vote against the proposed new rule!

CharlesToll
Concerned Citizen

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-jjiy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2129

Comment on DOS-2017-0046-0001

Submitter Information

Name: Camille Gilbert

General Comment

Bad idea!

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-fq83 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2130

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Spangler

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-d8b0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2131

Comment on DOS-2017-0046-0001

Submitter Information

Name: Clydell Peairs

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943h-x91u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2132

Comment on DOS-2017-0046-0001

Submitter Information

Name: R C

General Comment

Firearms, Guns, Ammunition, and Related Articles, like the human beings who use them, remain unchanged over the past two centuries, except for their capacity to inflict harm. Control belongs under the USML now more than ever.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943i-cx9r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2133

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allison Meisinger

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943i-p8qa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2134

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenneth Harrow

General Comment

please retain the ban on export of semi-automatic weapons. i am an expert on africa, and am aware of their use on conflicts such as that of Boko Haram in Nigeria, the fighting in the Central African Republic, and in the conflict in North Kivu in the Democratic Republic of the Congo. Another place is South Sudan. These conflicts have resulted in millions of refugees, of flight across the continent and to Europe, and enormous crises of political, economic, and social orders. Please prevent these weapons, the primary instruments in these conflicts, from being sold abroad. Ken Harrow, Amnesty International Country Specialist for Rwanda and Burundi.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943i-m8kp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2135

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Zeh

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943i-wg5b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2136

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dianna MacLeod

General Comment

I oppose switching the review of arms sales from the State Department to the Department of Commerce.

Congress would lose the ability to block sizable weapons sales, which means that countries with serious human rights violations could import weapons unimpeded.

Additionally, the Commerce Department does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

America has a gun problem; let's not export that problem to other nations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943j-p7uc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2137

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Ainsley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943k-mv8u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2138

Comment on DOS-2017-0046-0001

Submitter Information

Name: Miriam Burstein

Organization: NA

General Comment

I oppose switching the regulation of firearms exports from the State Department to the Department of Commerce. I fear that doing so would make it easier for weapons to get into the hands of organized crime and terrorist organizations around the world and would remove congressional oversight from the practice of selling weaponry. Decisions about weapons sales need to take into account issues of human rights violations, as well as problems of uncontrolled violence in countries where peaceful civilian life has broken down. These are matters for the State Department and Congress to investigate and assess, and are not mere business concerns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9431-8nvp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2139

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrea Maxwell

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943l-2t9p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2140

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tris Palmgren

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

For these reasons, I am opposed to the proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943m-nkly Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2141

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheri Wells-Jensen

General Comment

Export of weapons should be controlled by the state department. This is not like selling books, lamps or toasters. We cannot allow gun manufacturers to inject weaponry into any potentially dangerous situation they please simply for money.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943m-ratj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2142

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security and the Commerce Department just does not have the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943m-pjjq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2143

Comment on DOS-2017-0046-0001

Submitter Information

Name: virginia brinker

General Comment

Keep firearms classified as "military." There is no reason (except for the push of the NRA for sales) to move this category to the Dept. of Commerce. America needs more gun control than it has now. Innocent citizens have been gunned down on our streets; children sleeping in beds with drive-by shootings in their neighborhoods. The world does not need more of the same in their areas. We need to provide safety in our schools and neighborhoods keeping guns with the military classification. We need better firearms training of our police officers to head off needless shootings by them also.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943n-aqk4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2144

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Markalunas

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The effect will be to arm terrorist throughout the world. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943n-rm9d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2145

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristine Moore

General Comment

Please do not move control of firearms exports from the State Department to the Commerce Department. This would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943n-vn48 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2146

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexis Ladd

General Comment

Please act to prevent the sale of semi-automatic and similar guns to foreign bodies. The U.S. needs to stop being an exporter of violence and these guns do just that. As the overseeing body, you have the opportunity to block the transfer of the oversight of selling arms to the U.S. Commerce Department. As you know, the Commerce Department applies the lens of business development. This approach will work to boost the sales of guns and not regulate them, ultimately putting U.S. citizens in more danger. Creating an environment where people around the world can gain access to these weapons puts more people at risk, including Americans. We're seeing this across the United States with mass shootings happening every day -- so prevalent that they're not making national news anymore. Making more money at the expense of peoples lives and our national security is wrong. Let the State Department continue to do their job of limiting access to these dangerous weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943n-s7t9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2147

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ryan Houlette

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Moving the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This will make the world and the United States less safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943n-84im Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2148

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shel Tscherne

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-4uia Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2149

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Bilodeau

General Comment

Please stop this from happening. If it is allowed, the whole world will be experiencing the horror that the US is going through with increased murder and suicide from guns. Please don't allow this to go into effect.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-qacx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2150

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose the shifting of international arms sales from state to commerce departments. Please do not let this happen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-eyrm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2151

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-dday Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2152

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katie McCorle

General Comment

Right now, firearms exports are classified as military, and it is in the best interest of our country's security that it stay that way! This is why firearms are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place in the following ways:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you kindly for leaving the current rule in place!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-hafy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2153

Comment on DOS-2017-0046-0001

Submitter Information

Name: Walter Sizer

General Comment

I think transferring oversight of foreign arms sales to the Department of Commerce is a bad idea, because it would probably make it easier for people in other countries to get dangerous weapons and lead to a more violent world. I hope supervision of such sales would remain with the Department of State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-64ce Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2154

Comment on DOS-2017-0046-0001

Submitter Information

Name: Olga Lampkin

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-bnui Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2155

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paula Bushkoff

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-pgzt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2156

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janis M Soma

General Comment

I oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. At this time firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Deadly firearms should not be sold to whoever can pay for them. Our country's priority needs to be human safety, not profitability for firearms manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-qqlq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2157

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-56gc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2158

Comment on DOS-2017-0046-0001

Submitter Information

Name: anonymous anonymous

General Comment

Disgusting. Now the criminal NRA wants to see more murders and expand them worldwide. Don't we have enough death at their hands.
the NRA needs to be disbanded and made a terrorist group because that is what it is.
I don't support lay public having guns, they are for the police and military and need to be extremely restricted.
so NO NO NO NO NO gun exports.
stop the insanity now.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-u1xu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2159

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Dollard

General Comment

Please keep the State Department regulating weapons/arms/guns.

The State Department must keep the "Blue Lantern" program, in place since 1940, which carries out hundreds of pre-license

and post-shipment inspections and publicly reports on these weapons.

It should NOT remove licensing requirements for brokers, which could increase the risk of trafficking.

It should NOT remove the State Departments BLOCK on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department

successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with

access to a 3D printer, anywhere, to produce a lethal weapon. Changing this rule switch OUT of the State Department's

hands would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe which would

be a VERY frightening prospect.

You must make it HARDER to sell/produce weapons/arms/guns, because America and other countries need LESS

weapons/arms/guns, NOT more! Keep the State Department IN CHARGE OF these DANGEROUS weapons/arms/guns,

and do NOT let the Commerce Department regulate weapons/arms/guns, something it does NOT have the staff/knowledge/

training or manpower to enforce! Let the State Department do its job and HIGHLY regulate ALL weapons/arms/guns NOW!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-8jbq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2160

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine Zelehoski

General Comment

I want to urge the State Department to maintain control of U.S. munitions. The State Department has the manpower, checks and balances that make sure the U.S does not supply arms to countries where human rights issues are not respected.

It is essential that our country do all we can to promote safety and security here and around the world.

There is potential for

The Commerce Dept. in promoting business to increase arms sales to unruly nations and proliferation of guns is not an avenue to peace.

PLEASE keep control of U.S. munitions in The State Department.

Keep up the good work!

Christine and Ray Zelehoski

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-7b4u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2161

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cornelia Hoskin

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-5j93 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2162

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Asbell

General Comment

It is very important that the State Department continue to handle export licenses for semi automatic assault weapons and other weapons of war to protect our national security. It must not be made easier for criminals and terrorists to obtain American guns and ammo.

Allowing the Department of Commerce to handle these licenses is a dangerous idea driven by the NRA's desire to increase their profits. The NRA cares nothing for the safety or security of our country. We must.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-4pae Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2163

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jack epling

General Comment

This is a bad idea. What are they thinking!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-dqk3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2164

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Anonymous

General Comment

I am writing to you today to express my strong opposition to the proposed rule to transfer oversight of small arms exports from the State Department to the Commerce Department. The Commerce Department prioritizes doing business over safeguarding national security which would make this change far more dangerous for Americans.

We know the US gun industry is faring poorly in today's domestic market, which is why the NRA and the National Shooting Sports Foundation has been lobbying hard to remove congressional oversight of commercial weapon sales of \$1 million or more. No one else asked for it or wanted it.

The NSSF, a gun industry trade group, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobby's influence in the rule's description of semiautomatic assault rifles like the AR-15 as "civilian" products. These weapons were not designed for household use, the were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters.

If you go forwar with this disastrous policy, I will do everything in my power-peacefully and democratically- to hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and drain the swamp.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-x28b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2165

Comment on DOS-2017-0046-0001

Submitter Information

Name: Heather Williams

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-vex9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2166

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Dragonette

General Comment

I oppose the rule change that would switch the regulations of firearm exports from the US State Department to the US Commerce Department. The State Department enforces rigorous restrictions on gun sales overseas because their main purpose is to safeguard our nation. I believe that changing this responsibility to the Commerce Department, whose main purpose is to promote business, would greatly increase the risk of selling guns to terrorists and put American citizens at great risk.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-pkby Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2167

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alma Rutgers

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-qq40 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2168

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna W.

General Comment

I oppose changing fire arms regulations from the State Department, which protects our country, to the Commerce Department, which promotes American businesses. We need security!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943o-1bxg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2169

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martina Leinz

General Comment

I strongly oppose a rule change switching the regulation of firearms exports from the U.S. Department of State to the U.S. Department of Commerce. This would adversely affect our national security and destabilize countries around the globe. It would enrich the U.S. gun manufacturing industry at the expense of public safety. There is good reason to leave the regulation of firearms exports at State and maintaining the classification of firearms exports as "military." Congress should be able to block sales of firearms to foreign countries; particularly those with serious human rights violations. With this rule change, Congress would no longer be automatically informed of sizable sales that it could stop in the name of national security.

Martina Leinz
Burke, Virginia

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-azyd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2170

Comment on DOS-2017-0046-0001

Submitter Information

Name: S Kendall

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-yclf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2171

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-lo4a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2172

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Jiranek

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-ph9g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2173

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Fischer

General Comment

I oppose the proposed rule change to switch regulation of firearms exports from the US State Dept to US Commerce Dept. Such a change would facilitate arms exports to oppressive regimes, open the doors to organized crime and terrorist organizations, and further fuel the violence that is causing mass migrations. It will enable 3-D printing of lethal weapons with impunity. We need more controls on firearms not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-pl0u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2174

Comment on DOS-2017-0046-0001

Submitter Information

Name: joanie b

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

Firearms exports are classified as military" and they are under the regulation of the State Department, and it's why Congress can block sales of large batches of firearms to foreign countries.[1] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[2]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[3]

Here are more details on how the rule change would make the world a far more dangerous place:

- * It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[4]
- * It would remove licensing requirements for brokers, increasing the risk of trafficking.[5]
- * It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the

globe.[6]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

[1] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[2] Ibid., The Boston Globe

[3] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[4] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[5] Ibid., Violence Policy Center.

[6] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-q75o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2175

Comment on DOS-2017-0046-0001

Submitter Information

Name: Yolanda Mitts

General Comment

I oppose the rule change that would switch the regulation of firearms export from the U. S. State Department to the U. S.

Commerce Dept. Firearms exports are classified as "military" and should remain so. This change would endanger all the citizens of the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-s79p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2176

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eliot Faris

General Comment

I oppose additional expansion of anything leading to sale of guns in this country. They are readily available but the NRA wants to promote a variety of tactics designed to make them even more available. Legitimate purposes such as REGULATED hunting have a long history. However, the expansion of gun availability and variety is unconscionable. Additional REGULATION is highly preferable to additional deregulation. Armor piercing bullets, loopholes for background checks, selling of guns with no legitimate, hunting (Other than hunting for humans) purposes are reasonable restrictions. When the NRA proposes something, it is certain to be focused on additional accessibility to guns in private and public places. Please do not support this change.

Eliot Faris

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-rzr0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2177

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jay McCahill

General Comment

I am vehemently opposed to the proposed transfer of authority for regulating firearms exports from the State Department to the Commerce Department. The sale of weapons has national security and human rights implications that Commerce CANNOT manage, and Congress MUST be informed of and have the ability to block such sales, as they do in the current structure.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-gof2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2178

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary DeHoyos

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-2hgn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2179

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joshua Greenberg

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-dbxf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2180

Comment on DOS-2017-0046-0001

Submitter Information

Name: SALLY GIBBS

General Comment

I oppose the transfer of authority for Arms Sales from US State Dept. to the US commerce Dept. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-kcwz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2181

Comment on DOS-2017-0046-0001

Submitter Information

Name: George Sollo

General Comment

As a citizen who has worked in the area of firearms safety for 25 years, I oppose moving the responsibility for these weapons from the State Department to Commerce. This issue should not be about "commerce" but about the moral appropriateness of the use of the weapons of war by civilians. The State Department is in the best position to make that decision.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-oo6l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2182

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Scott

General Comment

Please do not change the regulatory restrictions on how firearms may be exported from the United States. During these days of too many mass shootings and times when angry people too often turn to guns first, thoughts next, we cannot add to this ease. When many in our government are working to tighten our borders concerning who or what is coming in, why would we loosen our borders concerning what is going out? Please do not allow big business to over rule our moral obligations and to change our regulatory systems.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-eb7e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2183

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sara Skinner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I volunteer regularly working with refugees. I am aware of how many countries have human rights violations. I am concerned that if we send these firearms to other countries, they may be used against innocent civilians. These are military-style weapons, and their sale should be regulated by the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943p-z4j0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2184

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Skirbunt-Kozabo

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

I strongly urge you not to implement this new rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-oly5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2185

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Jones

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-iokf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2186

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marcia Ogilvie

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-mlip Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2187

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marcia Reau

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When defense distributed founder, Cody Wilson, posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-rt6y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2188

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alycia Mosley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-b7d4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2189

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rhonda Garner

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-kfxd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2190

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Graham

General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Please keep regulations how they are

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-1lqp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2191

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary McCullough

General Comment

Opposed to proposed rule:

I'm extremely concerned about the rollback of these regulations. In particular the ease it would ability to use a 3D printer to create firearms. Although, criminals can do it now, it would remove prohibitions and provide easy access making traveling unsafe as they are not visible going through TSA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-juqp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2192

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Let's not make it easier for U.S. gun manufacturers to export more firearms into a dangerous world filled with terrorists anxious to use them against us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-t37d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2193

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karyn Walden-Forrest

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-87po Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2194

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marcella Amspaugh

General Comment

It is vitally important to keep the sales of semi-automatic rifles and other powerful weapons under the jurisdiction of the State Department. We should not get into the business of supplying weapons of war to foreign entities.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-llge Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2195

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aisha Noble

General Comment

I am a parent and active member in the early childhood education community in Chicago. I am opposed to amending the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

The firearms industry is hurting financially - revising these rules to benefit the fire arms industry's bottom line is NOT in the best interest of Americans or any global citizens.

We do not need more guns in the hands of those that wish to cause us harm. These high powered weapons belong in the hands of our military and not civilians.

Also, the amendments proposed would limit Congressional oversight on important gun export deals and drastically increases the possibility for gun trafficking. This is unacceptable.

I respectfully ask that the Department of State does not amend the International Traffic in Arms Regulations (ITAR).

Regards,

Aisha Noble

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-690j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2196

Comment on DOS-2017-0046-0001

Submitter Information

Name: Morgan Paulus

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-13cw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2197

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marcy Shinbaum

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-cr90 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2198

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vanessa Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-1mdl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2199

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am totally against this proposed rule change, The State Dept and Congress should continue oversight. Commerce and business have different goals than protection of human rights, safety etc and should not be given this responsibility.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-vthm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2200

Comment on DOS-2017-0046-0001

Submitter Information

Name: Max Salt

General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-c2xa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2201

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Krawisz

General Comment

I oppose the proposed rule change that would take firearm sales away from the state department and move it to the commerce department. We should not encourage the exportation of firearms. Most countries have fewer firearms deaths than the United States. We should not encourage firearms deaths in foreign countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-9q1c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2202

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Enright

General Comment

The proposed rule would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would also remove licensing requirements for brokers, increasing the risk of trafficking and would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon.

The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I oppose the proposed rule for the reasons above and many more to numerous to mention.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-gupc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2203

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betty Lawrence

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The State Dept. is the right place to control these exports. The Commerce Dept. is focused on sales, not safety.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943q-nxgc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2204

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alana DeJoseph

General Comment

I strongly oppose the rule change which would move the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress no longer being automatically informed about sizable weapons sales so that it could monitor or stop them in the name of national security, (especially in the case of sales to countries where there are serious human rights concerns, such as the Philippines and Turkey), is unconscionable, short-sighted, and greedy, at the expense of the security for future generations.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-znv9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2205

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Suda

General Comment

I oppose this Proposed Rule, and any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The handling of export licenses of semiautomatic assault weapons and other powerful firearms must remain with the U.S. State Department, which is charged with safeguarding our nation, not the U.S. Commerce Department, which promotes American business. The transfer of authority as proposed would open new floodgates for arms sales internationally, with serious implications for our national security. Because firearms are weapons for killing, firearms exports are rightly classified as military, and fall under the regulation of the State Department, where Congress can block sales of large batches of firearms to foreign countries. Under this proposed rule change, Congress would no longer automatically be informed about sizable weapons sales that could be prevented in the name of national security. In addition, the Commerce Department does not have the resources to adequately enforce export controls, nor does its Bureau of Industry and Security have staff everywhere. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would find it easier to obtain large caches of American guns and ammunition. Do not jeopardize our national security with this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-nfdc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2206

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fran Ransom

General Comment

I strongly oppose the change in regulating of firearm exports from the U.S.State Dept to the U.S. Commerce Dept I believe the Commerce Dept is not sufficiently able to regulate the flow This feels like a sly way for the Nra to enable more firearms that are intended for Military use onto the streets

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-qfsi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2207

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hoa Pantastico

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-3ynd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2208

Comment on DOS-2017-0046-0001

Submitter Information

Name: Howard Mielke

General Comment

For the following reasons I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department:

- *It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

- *It would remove licensing requirements for brokers, increasing the risk of trafficking.

- *It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-z29m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2209

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roberta Sol

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-1qtm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2210

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nicole Roman, RN

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-idtp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2211

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelsey Sarles

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms should be subject to more controls, not less! The safety of the public should always come before the NRA's profit interests.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-n7a3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2212

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jacqueline Eliopoulos

General Comment

This rule change is completely unacceptable. It will only serve to make the world a more dangerous place and help to destroy whatever civility there is on this increasingly violent and militarized planet. It puts our nation in greater danger as well as all others. Please reject this plan.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-crs1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2213

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Keenan

General Comment

Do not change this rule governing weapons sales from the State Department. Weapons sales need to be decreased not facilitated.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-x8vx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2214

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Avis

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-g7an Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2215

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ana Santoyo

General Comment

Do not change the regulation of firearms exports from the State Department to the Commerce Department to facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

If anything we need to reduce the number of guns and other weapons available in the US and the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-kze0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2216

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jack Polonka

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-hc5d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2217

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Schoultz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-k8u6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2218

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Hansen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is just a way for the gun industry to sell more guns around the world which will make them LESS safe!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-1je5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2219

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kirk Rhoads

General Comment

Semi automatic firearms should remain on the US Munitions list.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-4i9r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2220

Comment on DOS-2017-0046-0001

Submitter Information

Name: Randall Wayne

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms exports are currently classified as military. They are under the regulation of the State Department, allowing Congress to block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Moreover, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-jxhh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2221

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lauren Hayman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change will make the U.S. and the World a MUCH more dangerous place.

As a new mother, I do not want my child growing up in fear. I currently have faith in the State Departments Blue Lantern program that carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. This new rule will remove those licensing requirements for brokers, increasing the risk of trafficking.

It is also frightening that it will remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please DO NOT change this rule. The current rules keep us safe in this already very dangerous world of guns and firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-gjkg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2222

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Cooper

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-wy7b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2223

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angelika Ghosh

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-r9ph Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2224

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cecile Heatley

General Comment

I strongly protest against switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department does not have the resources to effectively enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face fewer hurdles to getting large quantities of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Changing oversight and regulation of firearms would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D-printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D-print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This is a dangerous, ill-considered, profit-driven move that produces revenues for the NRA and increases the likelihood of injuries and deaths.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-xgkp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2225

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jack Ray

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Here is how the rule change would make the world and the USA a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-khe1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2226

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Kemp

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-kxe7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2227

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allison Canning

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it would make the US & other countries less safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-ucxw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2228

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beverly Schmidt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-az3j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2229

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frank Moore

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Please vote in favor of making our country and our world a safer place.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-97ml Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2230

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Horwitz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943r-898a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2231

Comment on DOS-2017-0046-0001

Submitter Information

Name: cathy rupp

General Comment

I oppose the rule change that would switch the regulation of firearms export to the US State Department to the US Commerce Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-qole Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2232

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Richbart

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-xsf1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2233

Comment on DOS-2017-0046-0001

Submitter Information

Name: cathy rupp

General Comment

I oppose this rule change that would switch the regulations of firearms export to the US State Department to the US Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-ev01 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2234

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lesley Peters

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-6yrk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2235

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stanley Swiercz

General Comment

Too many enemies of the United States already have powerful weapons to use against our soldiers and citizens. Exports are not just a commercial concern, they are a security and diplomatic concern. Please keep export decisions under the control of the State Department with it's multidimensional perspective.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-nxcw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2236

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Shaw

General Comment

See attached file(s)

Attachments

I oppose the rule change

I oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department which is focused on safeguarding our nation to the U.S. Commerce Department which is focused on promoting American business. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Detailed concerns are that the rule change would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; would remove licensing requirements for brokers, increasing the risk of trafficking; and would remove the State Department's block on the 3D printing of firearms. Promoting American business at the risk of further destabilizing the world is a bad deal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-wtko Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2237

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Angelo

General Comment

The only sensible thing is to ban bump stocks and military style weapons from the general public! Please. It won't solve everything thing but it WILL solve a lot.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-r9vd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2238

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joann Wieland

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-jsrj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2239

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin Orozco

General Comment

Right now, firearms exports are classified as military, putting them under the regulation of the State Department and allowing Congress to block large sales of firearms to foreign countries. Under the Department of State's (DOS's) proposed rule change, the handling of export licenses of semiautomatic assault weapons and other powerful firearms would shift from the DOS (focused on safeguarding our nation) to the Commerce Department (focused on promoting American business). This means Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey, which would open new floodgates for arms sales internationally with serious implications for our national security.

The Commerce Department simply does not have the resources to adequately enforce export controls. The Bureau of Industry and Security does not have appropriate staffing levels to monitor and regulate firearms exports on the level that they deserve, given their import to our national security. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from DOS to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-cmsa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2240

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lauri Elliot

General Comment

I oppose this rule change which would switch the regulating of the exporting of firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

In short, such a rule change would make the world a far more dangerous place and this should be avoided at all costs!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-gnyn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2241

Comment on DOS-2017-0046-0001

Submitter Information

Name: ANITA LENDWAY

General Comment

I OPPOSE the rule change that would switch regulation of firearm exports from the U.S. State Department to the US. Commerce Department. The Commerce Department doesn't have the resources to enforce export controls. Congress needs to be informed about large firearm sales to foreign countries. We must protect national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-5dms Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2242

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Allen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-3o8l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2243

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kris Travis

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-vbuq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2244

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Gun safety everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-qxyo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2245

Comment on DOS-2017-0046-0001

Submitter Information

Name: Edith Frank

General Comment

I strongly oppose the the proposed rule. By reducing shipping regulations, it will increase the supply of firearms and provide easier access to them, magnifying the already severe problems associated with gun use such as mass shootings, suicides, domestic violence homicides and accidental homicides.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-a3ta Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2246

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kevin Quail

General Comment

Trump is an ignorant racist asshole.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-17tb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2247

Comment on DOS-2017-0046-0001

Submitter Information

Name: sue sullivan

General Comment

Do not let the NRA continue to operate without stricter regulations-they and the gun makers are killing thousands yearly.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-3gl9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2248

Comment on DOS-2017-0046-0001

Submitter Information

Name: Heather Beery

General Comment

I oppose the regulation of firearms by the U.S. Commerce Department for these reasons:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-dltk Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2249

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mollie Schierman

General Comment

I oppose the rule that would switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.

Currently firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

I believe that the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-wpgy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2250

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tama Smith

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-vlxs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2251

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Orozco

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Our safety should never be for sale. Our State Department has information not accessible to the Commerce Department that make them the appropriate agency for this role. The Commerce Department cannot be expected to weigh the proper considerations when making these decisions. We shall be watching these proceedings closely. Please do not move these responsibilities.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-ch7f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2252

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas and Patricia Frey

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The rule change to switch control of firearms from the State Department to the Commerce Department would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the world. The rule change would make the world a far more dangerous place.

Moving control of firearms to the Commerce Department would make legitimate efforts by the government and law enforcement agencies of every country vastly more difficult and dangerous... and that includes America.

We strongly oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943s-z1op
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2253

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tony Greiner

General Comment

It is unconscionable and immoral to consider moving international arms sales from the State Department to the Commerce Department. America has one of the best reputations, internationally, for being a good global citizen, defending human rights and peace in the world. Moving regulation of international arms sales from the State Department to the Commerce Department is based only on the immoral considerations of greed and promoting violence. Please reject any changes to International Traffic in Arms Regulations.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense

Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-4rbt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2254

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lara Alexander

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-sxdq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2255

Comment on DOS-2017-0046-0001

Submitter Information

Name: Herschell Emery

General Comment

I oppose strongly this rule change, which would (I believe most intentionally!) weaken US regulation of firearm exports. Weapons of war are far from just an issue to be monitored weakly by a Commerce Department uninformed of what international impacts arms sale overseas will have. Is the world no longer dangerous...just a fertile sales ground for the arms industry? Do we want the NRA setting policy for where we ship arms? Do we want a department without strong arms enforcement capabilities to be the only agency watching for arms traffickers? Leave arms classified as such--"military"--so that the State Department and Congress will retain oversight!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-s0jg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2256

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Gary

General Comment

Keep the rules intact!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-pip2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2257

Comment on DOS-2017-0046-0001

Submitter Information

Name: Valerie Wald

General Comment

This rule change would make the world a far more dangerous place.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

More specifically, this rule change would:

- Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- Remove licensing requirements for brokers, increasing the risk of trafficking.
- Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943s-8mz5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2258

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alex Fierro-Clarke

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-7kf4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2259

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Rosenkotter

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be better controlled.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-ik9j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2260

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fred Fall

General Comment

I oppose this rule change that would take control of traffic in firearms away from the State Department and give it to another department of the government. The State Department has done an excellent job in this regard and should be allowed to continue to do so.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-3wu7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2261

Comment on DOS-2017-0046-0001

Submitter Information

Name: michael daveiga

General Comment

The world and it's people desperately need adequate nutrition , clean drinking water , housing and other forms of shelter , hospitals and local clinics , schools , transportation networks , and all that supports a decent quality of life . What the world's people do not need are more arms !

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-b2kv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2262

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Roney

General Comment

I strongly oppose the proposed rule to move regulation and oversight of firearms (small arms) exports from the State Department to the Commerce Department. An agency that prioritizes doing business over safeguarding national security has no business controlling the sale of small arms. In addition, it's truly crazy to eliminate congressional oversight of commercial weapons sales of \$1 million or less. The obvious intent here is to increase sales for the faltering U.S. gun industry, at the expense of our national security. This is completely unacceptable. If this dangerous policy is implemented, U.S. national security is in jeopardy, as well as the safety of people around the world. Please think through the long-term implications of this change, none of which are good.

Thank you for your time and attention.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-xgjf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2263

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Schneider

General Comment

I am opposed to the proposed ammendments noted as the International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III. Terrorism and other violence doesn't need the release of additional and very violent weaponry spread across the world. Relaxing these regulations is tanamount to fueling a wildfire; the increase in profits to U.S. businesses, in my opinion, pales to the harm we can add to throughout the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-hhgd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2264

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lucy Krasnor

General Comment

I strongly urge the Commerce Dept and the State Dept to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns with less oversight and accountability. Guns are made to kill people in war and only should be used in war. we should be making it harder and not easier to export weapons of war.
thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-6e8w Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2265

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jacob Steijn

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Commerce does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you for the opportunity to provide this comment

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-a4b4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2266

Comment on DOS-2017-0046-0001

Submitter Information

Name: Valerie Snyder

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-c23f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2267

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shanti Toll

General Comment

Guns allow for more killing and violence toward all people and USA. PLEASE place people over profit.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

shanti toll

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-8814 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2268

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sadie Sullivan-Greiner

General Comment

The NRA is a corporate organization focused on one thing only: How much profit they can make from the sale of weapons. As it happens, I spent part of my career working in the ordnance world at DoD. I also live on the southern border.

The notion that ANY foreign military sales should be released to the Dept of Commerce is ludicrous. Much of the gun violence we deal with is a direct result of US weapons going over the border, to arm the drug cartels, who then create the violence in our cities associated with the drug trade. No sane person would want to increase that.

Weapons sales of any sort need to be housed in the State Dept. To do otherwise is self-defeating.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-z6dz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2269

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

To Whom it May Concern at the DOS:

I'm deeply concerned about the Proposed Rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

While the current administration has made it abundantly clear that US exports, and supporting large business is a TOP priority, the same administration is also name national security as a TOP priority, making major changes to immigration and imports/tariffs under that guise. I fail to see how reducing regulations on exporting firearms DOESN'T affect national security.

The State Department's focus is safeguarding our nation
The Commerce Department's focus is on promoting American business

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security: facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. How are any of those things in the best interest of our country? And doesn't nation security always come first? For example, the Defense Department has the largest slice of the US budget! And the president has tremendous powers to act in the name of national security (e.g., current travel ban), that are not available to promote business for a reason. So again, I fail to see how this proposed rule protects the national interests of this country. PLEASE STOP caving to NRA special interests, and continue to safeguard our nation.

With respect,
D

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-dmgh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2270

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peggy walsh

General Comment

I am deeply opposed to this proposed change to arms and traffic regulation. It is the last thing this country or the worlds needs. It is scam to line more pockets.

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-md2d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2271

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-l14m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2272

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need safe guards in place to ensure that large quantities of weapons are not being shipped to countries with dangerous regimes. Congress must continue to be notified when large quantities of weapons are sold and shipped and where they are going. The Commerce Department lacks the controls necessary to ensure that the United States remains a conscientious global citizen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-7if0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2273

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

please don't continue our legacy of dependence on killing jobs

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-gh3q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2274

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Irwin

General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It would remove the State Department ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally.

It would remove licensing requirements for brokers.

Would stop the program that inspects pre-license guns and issues reports.

Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism.

There is NO need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-ptx9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2275

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Harrison

General Comment

I strongly oppose changing the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department. The change would likely lead to more firearms being exported to oppressive regimes. It would remove safeguards now preventing organized crime and terrorist organizations from obtaining weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-9xhh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2276

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Wynne

General Comment

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, INcreasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PLEASE don't let this happen

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-2or5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2277

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Green

General Comment

I am against the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers organized crime, terrorist organizations and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Is the Trump Administration ready to support terrorist and organized crime in this manner? Is Trump ready to see more people die to serve his NRA masters? The world needs less guns not more and much, much stricter regulations and safety laws.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-o4cb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2278

Comment on DOS-2017-0046-0001

Submitter Information

Name: Colleen Daly

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943t-ytz3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2279

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julia Michalak

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Exporting military grade weapons without congressional or diplomatic review opens the door to allowing US companies to provide arms to authoritarian governments, terrorists and other unethical entities. The sale of semi-automatic weapons of war is not simply a business decision, it is 100% an ethical and diplomatic decision that requires oversight from US government - and not just the commerce department, which does not have the expertise or resources to adequately evaluate these sales. The United States absolutely should not be selling weapons of war without substantial oversight from elected officials and staff with the expertise to evaluate the human rights and diplomatic implications of these sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-fo79 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2280

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kay Oring

General Comment

Keep the international sales of US munitions in the State Department. The US exports too many munitions and arms now. Congress should continue to have the authority to control such sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-t6c7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2281

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah Bronstein

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3] Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943u-twp9
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2282

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Angle

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The NRA is pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security and those of other nations.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This is why it is so dangerous.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. THERE IS NO JUSTIFICATION OR REASON FOR THIS CHANGE.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D print weapons. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. THIS NEW TECHNOLOGY ALONE MAKES THIS CHANGE EXTREMELY DANGEROUS.

PLEASE DO NOT ALLOW THIS PROPOSED CHANGE. IT IS DANGEROUS FOR THE US - AND THE WORLD. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-r3g5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2283

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Fitzpatrick

General Comment

I oppose change from U.S. State Dept. to Dept. of commerce for sale of guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-15y9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2284

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeanine Moyer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department is focused on safeguarding our nation, while the U.S. Commerce Department is focused on promoting American business. This transfer of authority could open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports from the State Department to the Commerce Department would could lead to firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-z17e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2285

Comment on DOS-2017-0046-0001

Submitter Information

Name: Yvonne Greenbaum

General Comment

The State Dept should continue to be in charge of large arms sales so that they can be properly monitored and reported to the public. This is a play by the NRA to make guns more available everywhere.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-1d1o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2286

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angela Haddock

General Comment

Firearms sale should continue to be under the jurisdiction of the State Department. The Commerce Department is, obviously, more interested in MONEY than SAFETY. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-72zh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2287

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alyce Dodge

General Comment

I oppose switching the regulation of firearms exports from the U. S. Department of State to the U. S. Department of Commerce.

There are many good reasons why firearms exports are classified as military and are closely regulated under the Department of State, with Congress given notifications of sizable weapons sales to foreign countries and the ability to block these sales for national security.

The Department of State provides needed gun export oversight, which the Department of Commerce does not have the resources to do. Enforcing the current regulations prevents firearms traffickers, terrorist groups, organized crime, and oppressive regimes from obtaining large caches of American guns and ammunition.

However, if gun export licensing is moved to the Department of Commerce, Congress would not be informed automatically of notable arms sales, and safeguards would be removed so that dangerous agents could more easily obtain semiautomatic assault weapons and other powerful firearms, and this opens the floodgates for destabilizing violence around the world.

The handling of export licenses of assault weapons is properly under the Department of State, which is focused on safeguarding our nation. The Department of Commerce, with its focus on promoting American business, is not the suitable agency for regulating arms exports.

I read somewhere Those who live by the sword, die by the sword. Exporting weapons around the world is not an ordinary business like exporting food or solar technology. For the sake of children everywhere, lets do all we can to prevent violence and the suffering it causes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-8sdp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2288

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maxine Petrucci

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-rsds Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2289

Comment on DOS-2017-0046-0001

Submitter Information

Name: Renee Ducker

General Comment

No Exporting Of Fire Arms. Save Our Children and Garndchildren; Say NO Today!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-recj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2290

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Singer

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Seriously.

Susan O. Singer

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-udzt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2291

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Torok

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-o7j8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2292

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Wales

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-q3kl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2293

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Kennedy

General Comment

I understand that the NRA is pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change threatens our security at home and abroad. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This makes no sense at all. Please stop this insanity of gun violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-vrsb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2294

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurie Franklin

General Comment

I can't even believe you are considering something as bone headed as switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The goals of those two departments are completely opposite - from one that would restrict weapons sales in the interest of national security, to one that would promote it to benefit U.S. businesses. To be perfectly clear, I oppose this rule change that would make our country and the world drastically less safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-h6h1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2295

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annie Harmon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-1lrg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2296

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Kramer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-mtr Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2297

Comment on DOS-2017-0046-0001

Submitter Information

Name: Drew Lindhoff

General Comment

So it now appears that national security takes a back seat to profit. Please keep the regulation of exported gun sales where it belongs...in the State Department, or face the possibility of another 9/11 type attack.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943u-kzww Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2298

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marjory Donn

General Comment

Please do not transfer regulation of firearms from the US State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-uu91 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2299

Comment on DOS-2017-0046-0001

Submitter Information

Name: K. Young

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. There is no good reason to make it easier for manufacturers to export firearms to other countries, to remove licensing requirements for brokers or to remove the block on the 3D printing of firearms. This is a dangerous rule change and it should be rejected.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-fx74 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2300

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Cloonan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-vwj1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2301

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill Chockla

General Comment

Hello,

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department! It is bad enough this country leads the way in allowing "poison for profit" in so many of our consumer goods. All in the name of capitalism, greed, ignorance, arrogance. Now we want to add firearms world wide?! This is pure insanity! Just look at how sick the domestic terrorist murders are in the states today. This will open the door for ALL countries to "enjoy" the murders while the "good, rich, white, conservative christians" roll in more profits! Pro-life? I think not! Pro CULT is all they really are! Studying the ORIGINS of their cult PROVES they are the ones we need to STOP! NOW! So, PLEASE! Do NOT allow these regulation changes!!

Regards,
Bill

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-b4az Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2302

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenna Bolton Holz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-8wj5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2303

Comment on DOS-2017-0046-0001

Submitter Information

Name: Travis Jennings

General Comment

I oppose the rule to change the regulation change the fire export from the U.S. State Department to the U. S. . Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-wcz2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2304

Comment on DOS-2017-0046-0001

Submitter Information

Name: A L

General Comment

I STRONGLY oppose this rule change that would shift the the handling and regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This is entirely inappropriate and unsafe. This responsibility needs to remain with the U.S. State Department, because its focus is national security. The U.S. Commerce Department is completely inappropriate because its focus is on promoting American businesses, and in this case, it would be weapons sales. Its focus would be money and not national security. This is dangerous.

Further, it is my understanding that firearms exports are all classified as military. This is critical because, under the authority of the State Department, Congress is now able to block sales of large batches of firearms to foreign countries. If the authority is shifted to the U.S. Commerce Dept, Congress would be utterly uninformed about sizable weapons sales that it could (and should) stop in the name of national security. Congress would similarly be uninformed about weapons sales to countries where there are serious human rights concerns, as in the case of he Philippines and Turkey.

Again, this change would be a HUGE MISTAKE, and one that I adamantly OPPOSE. It is NOT in The United States best interest. It would be in the NRA's best interest. That is wrong.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-hi33 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2305

Comment on DOS-2017-0046-0001

Submitter Information

Name: Virginia Konz

General Comment

I strongly oppose this proposed change in the control of guns in this country and abroad. It will not make us safer; on the contrary it will provide fewer controls ; makes me feel very unsafe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-qi1j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2306

Comment on DOS-2017-0046-0001

Submitter Information

Name: Loren Kollmar

General Comment

I am in opposition to this proposed change. I am not anti gun, but I don't think flooding the world with more guns is responsible or sensible. There are enough loop holes currently existing to negate this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-rqze Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2307

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please do not change the control of the export of firearms to the Commerce Department. Why would we want to do this? To promote terrorists?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-9nkq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2308

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rahel Ruiz

General Comment

I am writing to oppose the move of weapons sales and licensing from the State Department to the Department of Commerce.

Here are several reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In addition, the commerce department does not have adequate resources to enforce export controls.

This transfer is bad for the U.S. and is bad for the world.

Thank you,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-xtfk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2309

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elaine Madjeski

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-h52t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2310

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Lander

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Don't we have enough people dying from these killing machines???

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-pxqg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2311

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Harris

General Comment

To Whom It May Concern:

My family and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a matter of national security - we must not and cannot permit any change that will open the floodgates of weapons trading.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943v-x279 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2312

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ms. Sandra Silva

Organization: self

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-lxwe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2313

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Douglas

General Comment

I strongly oppose this U.S. State Dept. rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-hx8q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2314

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Waite

General Comment

Please DO NOT switch regulations of firearms export from the state Dept.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-ktw0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2315

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Dawson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

And please remember that the majority of military-grade weapons used by the Mexican drug cartels are obtained from the US!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-tu35 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2316

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kara Brinkman-Addams

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-bsp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2317

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gene and Rita Collins

General Comment

I strongly OPPOSE changing regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It could result in more weapons on the street - certainly we have enough illicit use guns. I believe it would result in increased weapons at home and abroad and restrict The State Department's oversight of many current activities. more weapons domestically and internationally.

It would remove licensing requirements for brokers.

It stops the program that inspects pre-license guns and issues reports.

We do not see the need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-6e3d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2318

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Olsen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Thank you for your consideration of this very serious matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-mf56 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2319

Comment on DOS-2017-0046-0001

Submitter Information

Name: Juliet Waldron

General Comment

Switching regulation of firearms exports from the State Department to the Commerce Department is a dangerous, short-sighted idea. It will facilitate exports of weapons to oppressive regimes, and remove the safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and it will further fuel violence that destabilizes countries and leads to mass migrations of refugees.

If you switch regulation of firearms exports to the Commerce Dept., it will eliminate the State Department's Blue Lantern program, in place since 1940. Blue Lantern carries out hundreds of pre-license and post-shipment inspections and publicly reports on the results of their inspections.

This change will also remove licensing requirements for brokers, which will instantly encourage trafficking. Worst of all, the change to the less well-staffed and more porous Dept. of Commerce will remove the State Department's current block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Dept. successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer--anywhere in the world--to produce lethal weapons. The rule switch you are proposing will remove this block, and enable 3D printing of firearms in our home-grown terrorist organizations--as well as all over the world.

This will contribute to instability and violence all over the world and lead to yet more blood on the hands of our country. Our own nation is already dangerously divided; the rule of law is derided by men who think they are above the law. Allowing the unchecked flow of assault and other large caliber weapons will lead to yet more gun violence, more mass shootings of helpless and harmless civilians and children, and at last to the kind of sectarian bloodshed such as we have seen in countries all over the world--only this time, it could happen right here, in America.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-943w-2c6y
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2320

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elisabeth King

General Comment

I am registering my dismay at any efforts to increase export of munitions, especially to Mexico, Central America and to any nation that is at all politically unstable. Mexico is the country that I know most about because I volunteer with Greater Boston Trade Justice, a group of citizens in eastern MA working to improve NAFTA. However the dynamics in all these countries are similar.

Access to weapons is critical to the survival of drug cartels, so they love America's current lax gun laws. 70% of guns recovered in crimes in Mexico can be traced to the USA. High caliber rifles are preferred.

At present guns and cash are transported illegally overland along the same routes that drugs are transported north. How much easier would it be if the money obtained from drug sales were to be spent on guns legally imported into their own country? Given the cartels' level of infiltration into local and even federal government, laws regulating legal sales are very weak.

Violence related to drug trafficking is currently a huge cause of fear for life in Mexico and Central America. Thus the problem of aliens illegally crossing the border into USA is exacerbated.

Given these facts, how does increasing firearms exports even make sense if you at the same time want to decrease illegal immigration?

In addition, how is this deregulation different than the Fast and Furious program, in which Border Patrol Agent Brian Terry was killed in December 2010? That program was rightly criticized, especially by politicians on the right side of the aisle. But that program at least tried to actually fight criminal activity. Deregulating gun exports would only increase it.

Please reconsider this deregulation.

Sincerely,

Elisabeth King

23 Greymere Rd. Brighton, MA 02135

Sent from AOL Desktop
Liz King 617-787-0165, 857-225-0396 Bking32@aol.com

Greater Boston Trade Justice FB: Greater Boston Trade Justice

Ezekiel cried out to the King of Tyre, in the abundance of your trade you were filled with violence and you sinned (28:16)

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-l9ux Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2321

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jay Unger

General Comment

Automatic and Semi-Automatic Weapons whether currently available in the U.S. from commercial dealers are primarily weapons of war designed to kill people with maximum efficiency. Reclassifying these exports as non-military and subjecting them to less scrutiny when sold outside the U.S. is dangerous both to human life and the U.S. foreign policy interests. Imagine the outrage that will be levied at the U.S. by allies and/or others if such weapons become as easily and inexpensively available abroad as they are presently in the U.S. where they have been shown to encourage gun violence and even mass murder in schools, shopping centers, concert venues, etc. Continuing to apply more scrutiny and higher export registration fees will discourage U.S. manufacturers of such weapons from offering them commercially abroad.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-4e5c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2322

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine Cote

General Comment

Firearms exports must continue to be classified as military so that they are under the regulation of the State Department, and so that Congress can block sales of large batches of firearms to foreign countries. If firearms are not classified as "military", Congress would no longer be automatically informed about sizable weapons sales and could not stop them in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This would be dangerous to the US and to the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-kiae Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2323

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annie Emmerling

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943w-b4yr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2324

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kerry Wiessmann

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to

The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-ve13 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2325

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Anderson

General Comment

Dear Sir or Madam:

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you likely know, this rule change would, among other things:

(a) eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

(b) remove licensing requirements for brokers, increasing the risk of trafficking.

(c) remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not move forward with this rule change.

Sincerely,

Mark and Candace Anderson

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-kh3t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2326

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Canales

General Comment

I oppose the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! As a public health nurse and a citizen concerned about human rights and global health, I strongly oppose the proposed rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-mx7k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2327

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jen Manders

General Comment

Please keep ITAR governance under the US State department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-msu7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2328

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Watts

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-vy7h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2329

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Homp

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-l6yw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2330

Comment on DOS-2017-0046-0001

Submitter Information

Name: Benetta Barnett

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-mgju Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2331

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rita Kain

General Comment

The sale of "assault" style weapons must come through the state department. If left to commerce our national interests will NOT be followed. The weapons will probably end up in the hands of enemy governments or terrorists. The truth is, we won;t know until it's to late.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-sbj Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2332

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael White

General Comment

This change conflicts with the nature of the military grade weaponry we export
Imagine 10 more Mexico-like countries that will result.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-8ko5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2333

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rev. Phoenix Hawelu-Hills

General Comment

Why would we change how guns are handled by our government? We need to keep the U.S. State Department in charge of the selling and exporting of dangerous things like guns and weapons because it is the job of the U.S. State Department to safeguard our country! Changing the department that safeguards our country to the U.S. Commerce Department would be outrageous and unsafe!

Firearms are dangerous!! They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They are used to kill U. S. citizens daily. We need MORE controls on how these weapons are acquired!

They should be subject to far more controls, not less!

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Do not change how guns and weapons are classified! They are classified as "military" because that is how we keep our country safe! This is why they are under the regulation of the State Department!!

Please keep us safe. Don't let big business control how many of our enemies have weapons because they don't care about our lives!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-ozb5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2334

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Anonymous

General Comment

Please do not enact this rule. Anything that increases traffic in arms should be examined carefully. There isn't enough justification for this if you remove the profit motive. We don't need the industry taking over. The profit motive should not outweigh international concerns, and control should remain with the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-88qm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2335

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Rosa

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-upoq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2336

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nora Brown

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-sjl4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2337

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charlotte Pirch

General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I strongly oppose this regulation.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-orco Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2338

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca B. Wilk

General Comment

Please do NOT promote gun manufacturers' profits at the expense of people's lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943x-z6om Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2339

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-o3pn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2340

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-3g3w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2341

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Monroe

General Comment

The State Department must continue to regulate the export of firearms. The role of the State Department is to interact with other countries in a way that protect American interests and the interests of other nations. As possible agents of death, firearms can compromise both American and foreign security. The State Department has a compelling interest in preventing, or at the very least overseeing, the sale of firearms. Please do not relinquish this authority.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-fc08 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2342

Comment on DOS-2017-0046-0001

Submitter Information

Name: Darien Gardner

General Comment

To the U.S. State Department,

I am writing to express my opposition to any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I believe such a rule change would be extremely unwise because the State Department has the facilities needed to prevent guns from falling into the hands of organized criminals, political extremists, terrorists and human rights violators around the world. The Commerce Department is much less well equipped to do this.

Sincerely,
Darien Gardner

Darien Gardner
51 Pilgrim Dr.
Northampton, MA 01060

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-mlif Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2343

Comment on DOS-2017-0046-0001

Submitter Information

Name: Edgar Gehlert

General Comment

Hi!

Oppose giving this authority to Commerce.

We need less guns here in US and around the world.

Guns are for murdering humans.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-ptk1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2344

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Schumerth

General Comment

I oppose transferring arms regulation to the Dept. of Commerce. This would open the door to even more arms trafficking than we already have. I find it stupefying that POTUS Trump, who spends most of his time complaining about arms trafficking across the border, would support such a move. It must be stopped!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-8151 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2345

Comment on DOS-2017-0046-0001

Submitter Information

Name: A. Pierce

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change in the administration of gun sales will create a fundamentally more violent and unsafe world both inside and outside of the U.S.

This change would:

1. eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them
2. remove licensing requirements for brokers, increasing the risk of trafficking
3. remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

For these reasons I strongly oppose this regulatory change in arms sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-jt49 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2346

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mha Atma Khalsa

General Comment

As a very concerned U.S. citizen and taxpayer I appreciate your carefully considering my comments!

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

More reasons that the proposed rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please cancel this proposed rule change!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-2ht9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2347

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jodi-beth McCain

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not change the rule

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-6h5d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2348

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Miller

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-umqt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2349

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra aNONYMOUSE

General Comment

I strongly oppose the proposed rule to allow international traffic in arms regulations from the State Dept to Dept. of Commerce.

Really, are guns just a commodity now? It would remove the State Departments ability to restrict 3D printing. Is this the best way to govern? Appauling.

It would also remove licensing requirement for brokers and stop the program that inspects prelicenses.

We CANNOT let this happen in our country and our place in the world. Seems like we've given up being civil!.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-xohp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2350

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tana Senn

General Comment

I understand there are regulations being explored to move the regulations of the sale of guns from the State Department to the Commerce Department.

I do NOT support this move. The State Department is doing a good job and understands the myriad geo-political issues with selling weapons to different countries. This context should remain when looking at the sale of weapons. We have seen too much instability in the world from our sale of weapons to varying governments, rebel groups and others. We must look at the bigger picture of weapons sales and not just look at profit.

Please do NOT move this oversight capacity from the State Department to the Commerce Department.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943y-kdkz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2351

Comment on DOS-2017-0046-0001

Submitter Information

Name: Matthias Hess

General Comment

I strongly oppose any rule changes to give authority over arms exports to the U.S. Commerce Department. I worry that the Commerce Department would push weapons sales abroad, driving deadly conflicts even more than they already do. The State Department's mission is to protect our country, and they authority over firearms exports in order to do so effectively.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-32fy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2352

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charlotte Johnson

General Comment

To whom it may concern,

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-9h3b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2353

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joyce McDonald

General Comment

BAN ALL AUTOMATIC AND SEMI-AUTOMATIC WEAPONS IMMEDIATELY! BAN GUN SHOWS!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-5t25 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2354

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lacey Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-wfkt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2355

Comment on DOS-2017-0046-0001

Submitter Information

Name: Caryn Cowin

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-zoo8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2356

Comment on DOS-2017-0046-0001

Submitter Information

Name: bonnie monte

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. This cannot be allowed to happen! The NRA may be the most dangerous, destructive, immoral and criminal "terrorist" organization in the world today, and I do not use the word terrorist lightly. We MUST retain control and knowledge of all gun sales and we cannot create new systems that would give the NRA and gun manufacturers free rein.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-x1h9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2357

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

I oppose changing rules that would increase International sale of arms. Keep the State Departments Blue Lantern Program. Keep the State Departments blocking of 3D printing of weapons. Why are we trying to arm the world. This is foolish!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-zax1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2358

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Sanders

General Comment

I am in opposition to any change in the sales and deportation of firearms listed as category I,II, or III, Doing so may, no, will endanger the security of the nation. Running arms to terroist and drug gangs is limited now but would only escalate arming these thugs under Commerce Dept rules. Again I am in opposition to this change

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-69w8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2359

Comment on DOS-2017-0046-0001

Submitter Information

Name: Edna Montague

General Comment

The sale of fire arms and weapons should stay under the State Department to ensure that weapons do not get into the hands of terrorist or enemies of this counrty. The State Department has been doing a good job of monitoring the sales so they can be stopped before it is to late. The Commerce Department does not have the personnel or experience to monitor the sales of weapons. This change will seriously jeopardize our national security . I ask that there be no rule change regarding the sales of weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-qvil Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2360

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Don't allow the export of semi-automatic weapons. This could put them into the hands of our enemies or those with health issues who would endanger lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-56wt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2361

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Greenberg

General Comment

Firearms exports are currently classified as military. That is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. That means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; would remove licensing requirements for brokers, increasing the risk of trafficking; would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-heqo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2362

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patrice Giffith

General Comment

The argument of cost savings is false and deceptive. This move to the Dept of Commerce would cause many small conflicts throughout the world to be exacerbated as conflicts would likely worsen, with potential detriment to our national security. This move also affects our immigration policy as many of the immigrants to the US are seeking asylum from severe conflicts and violence in their home countries. The only entities to benefit from this are gun manufacturers. This change needs to be halted now for humanitarian and national security reasons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-amp7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2363

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sally Gudgel

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-9lle Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2364

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Thompson

General Comment

Please continue the strict regulation of international firearm sales from United States manufacturers and other US based sellers This helps keep Americans at home and on foreign military duty safe from harm from a weapon originating in our own country. Its the patriotic thing to do. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-w2vg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2365

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Herting

General Comment

I am opposing the new rule change that would switch the regulations of firearms export sales from the U.S. State Department to the U.S.Commerce Department . That just gives firearms traffickers, organized crime and other violent agents more opportunities

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-943z-lz3x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2366

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leah Mathers

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-zw0x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2367

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Sollod

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-6lll Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2368

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bruce Beese

General Comment

I am against the movement of oversight of firearms exports from the State Department to the Commerce Department.

Please do not make this change. Firearms regulation are just fine under State.

Thank you,

Bruce Beese

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-69bm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2369

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Kent

General Comment

How would allowing access to automatic weapons by private citizens in foreign countries keep us in the United States safer? Just asking. David Kent

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-qo17 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2370

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

A rule change to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department is a dangerous idea to all Americans, since it has serious implications for our national security.

Currently, firearms exports are classified as military, so the State Department can regulate their sale and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The current administration talks endlessly about national security, but if this rule change goes through, we will all see that their real top priority is allowing the gun manufacturers to make more money and they really don't care about Americans security at all.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-iwts Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2371

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sammy Low

General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are under the regulation of the State Department and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This is crazy and dangerous. Do NOT make this rule change and endanger our country further.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-ac7l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2372

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joy Hamby

General Comment

I believe the regulation of firearms sales should stay under the US Department of State, so the Congress continues to have veto power. Check and balances are necessary in every public office.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9440-sicu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2373

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leilani Alberty

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-6iqz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2374

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Collmer

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-qewm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2375

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marcia Riley

General Comment

I urge you not to change the control from the dept of Defense to the Dept.of Commerce.Guns are military weapons and should be regulated as such. Bypassing the Dept of Defense is dangerous . We need more control not less and allowing the unchecked sale of guns would create the increase of sales to volitive countries.\

This is just stupid and unnecessary.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-zkbp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2376

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alison Norman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-3m6s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2377

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Koury

General Comment

I oppose this rule because the bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-1bzz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2378

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine Stankiewicz

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-ov51 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2379

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Sandiford

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are some ways that this rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-dhd7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2380

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Schildwachter

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-99ro Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2381

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Rozek

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls, which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-v6e9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2382

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelly Korenak

General Comment

I oppose the proposed rule because the regulation of weapons, and especially assault style weapons, should be with the State Department, not the Commerce Department. If the intention of this regulation is to prevent trafficking, then this responsibility should rest with the State Department, as the Commerce Department does not have the resources to properly enforce this. The Commerce Department's aim is to increase trade, and while that is fine if we are talking about strawberries or salt, this is a dangerous precedent to set for a product that is lethal - gun exports and manufacturing should require extra scrutiny and regulation, and I strongly oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-xdqf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2383

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Lemon

General Comment

Moving regulation of firearms export from the Department of State to the Department of Commerce seems like a misguided idea, and is likely to decrease our country's security. Without treating firearms as a military export, the risks of accidentally enabling terrorists and arms traffickers are simply too high.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-dqh4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2384

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Gladstone

General Comment

The proposed rule to loosen regulations on firearm exportation is terrifying. Why would we want to arm the rest of the world? So that they can attack? So that they can build militias and guerilla warfare? So that these guns can end up in the hands of terrorist groups? Stop arming terrorists! Dont implement this change, it is too dangerous for our country and the world.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9442-69jh
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2385

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Mariconda

General Comment

I am an an ordained Deacon in the Episcopal Church and I am very concerned about this rule change. I was in Newtown Connecticut at the time of the Sandy Hook tragedy. I am very concerned that this proposed change will impact the lives of so many living under gun violence. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-bk6r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2386

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!! This would make it much easier for dangerous people to obtain weapons they could use on Americans at embassies around the world. It would also allow oppressive regimes to get more weapons that they could use on anyone who speaks out against them.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-32ud Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2387

Comment on DOS-2017-0046-0001

Submitter Information

Name: Abigail Richardson

General Comment

Please continue to handle export licensing of semiautomatic assault weapons and other powerful firearms within the U.S. State Department (focused on safeguarding our nation). Do NOT move it to the purview of the U.S. Commerce Department because this transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

If the U.S. Commerce Department is given this responsibility, it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-ybfe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2388

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Genevie

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9442-ddy6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2389

Comment on DOS-2017-0046-0001

Submitter Information

Name: Chad Reddick

General Comment

I am deeply concerned with the proposed plan to switch regulation of firearms exports from the State Department to the Commerce Department. Anything that can make it easier to sell more guns overseas compromises United States security. Please take whatever steps are necessary to tightly regulate overseas firearms sales in order to keep people in America, and around the world, safer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-690s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2390

Comment on DOS-2017-0046-0001

Submitter Information

Name: Henry Newhouse

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-9tul Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2391

Comment on DOS-2017-0046-0001

Submitter Information

Name: B Dudney, MD

General Comment

Opposed to shifting regulation of firearms export to U.S. Commerce Department.

Would stop Congress being automatically informed of weapons sales it could stop in the name of national security, especially to countries with serious human rights abuses, such as the Philippines and Turkey.

Commerce Department lacks resources to enforce export controls: Bureau of Industry and Security does not have staff everywhere. Hence, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate:

- ..the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- ..licensing requirements for brokers, increasing the risk of trafficking.
- ..State Departments block on 3D printing of firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-sqi5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2392

Comment on DOS-2017-0046-0001

Submitter Information

Name: Warren Wilkins

Organization: Warren Wilkins Designer

General Comment

Gun money is blood money. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-uuw1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2393

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ivan Rhudick

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress should continue to monitor the sales of large amounts of weapons to other nations in the interest of national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-7xwc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2394

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roger Peeters

General Comment

I am a gun owner and former hunter and strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It would remove the State Department ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally.

It would remove licensing requirements for brokers.

Would stop the program that inspects pre-license guns and issues reports.

Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism.

There is NO need to switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9443-urvd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2395

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Massey

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a dangerous and irresponsible action that must be stopped. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They have been pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department, which its primary focus is on promoting American business. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Firearms exports are classified as military under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With having firearms sales regulated by the U.S. Commerce Department, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The reality is - this is not only dangerous for other countries, but our country as well. This is truly an insane proposition that would turn ugly and deadly fast. The NRA has already proven that they don't care about anyone's life and that they will go to great lengths to get what they want. This must be stopped because they don't care how many people will die in other countries or this one as long as they make their billions. They just don't care.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-1e7m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2396

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rosalind Bresnahan

General Comment

I strongly oppose the rule change that would transfer the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Arms are not just another US export to promote and arms sales should be subject to review for non-commercial implications such as use in human rights violations. These are foreign policy issues and should be treated accordingly.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-aoxg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2397

Comment on DOS-2017-0046-0001

Submitter Information

Name: L. Fielder

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-2vps Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2398

Comment on DOS-2017-0046-0001

Submitter Information

Name: Derek Benedict

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We truly do NOT need to export more weapons of death around this planet.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-dkl2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2399

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angela Mogin

General Comment

We should not be exporting these dangerous weapons overseas. They serve no purpose other than to kill human beings. In an unstable world, exporting these weapons would be like throwing a match into a pile of tinder.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9444-o838 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2400

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean W

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change will result in more unregulated and unreported gun sales. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9445-pfdm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2401

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elena Rumiantseva

General Comment

I disagree with this rule change. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9445-wsrk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2402

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynette Lowe

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9445-wli3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2403

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

For Gods sake, do NOT allow the switching of the regulation of firearms exports from the State Department to the Commerce Department!

Without question, it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel the violence that destabilizes countries and causes mass migration.

Although Putin would like the way it would further undermine the reputation of standing for world peace that the USA has nurtured since its foundation, even he wouldnt approve of this if it meant his citizens could buy the guns.

Please, please do not let the NRA get away with this dangerous, greedy, thoughtless move. Keep gun control and the control of export licenses of semiautomatic assault weapons and other powerful firearms within the State Department!!

Our national security and, to a large extent, that of the world, depends upon it!

I would ordinarily leave my contact info but I'm afraid of NRA repercussions.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9447-ekh1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2404

Comment on DOS-2017-0046-0001

Submitter Information

Name: Theresa Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9447-rv6j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2405

Comment on DOS-2017-0046-0001

Submitter Information

Name: Violet Young

General Comment

I think this is a terrible idea and should not be allowed to go forward.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9448-nio6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2406

Comment on DOS-2017-0046-0001

Submitter Information

Name: Galen Walker

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9449-86n4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2407

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Habenicht

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944a-ro36 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2408

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheila Stone

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous and there needs to be more control, not less, to prevent acts of organized crime, political violence, terrorism, and human rights violations around the world.

I strongly oppose this rule that would make the world a more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944a-jiks Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2409

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Livingston

General Comment

Dear sir

I am writing to oppose the proposed changes to the regulation of domestic Firearm sales to foreign purchasers.

The United States has supplied weapons to foreign groups in the past only to have those same weapons used against our own military personnel. Mistakes were made in the past but I would rather arms sales were regulated by the State Department whose aim is to protect the safety of our nation. The Commerce Department has a goal of increasing our sales and isn't tasked with determining whether those sales constitute a future danger to our country.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944b-iywe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2410

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I have heard about the proposed rule change moving regulation of arms sales from the Department of State to the Department of Commerce, and I strongly oppose this change. The Commerce Department will encourage arms sales, which will only increase the number of arms throughout the world. This will potentially make travel more dangerous for Americans traveling abroad, and will make the world more dangerous in general--a bad move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944b-u60x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2411

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen McDonald

General Comment

I am opposed to the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns or US national security concerns. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. In addition, it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; it would remove licensing requirements for brokers, increasing the risk of trafficking; it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944b-hreq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2412

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann White

General Comment

I understand that there is a request from the NRA to change the department that regulates the export of firearms from the State department to the Commerce Department. The result can only be the increased export of dangerous guns around the world.

Is this wise? American business is amoral too much of the time, and more guns around the world can not be good for the American people or any people. Do not allow this change!

Ann White

Arrington, TN

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-krpl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2413

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Morgan

General Comment

Im writing because I am strongly against a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-y0o5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2414

Comment on DOS-2017-0046-0001

Submitter Information

Name: Em W

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Therefore, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-aly Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2415

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Klein

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Please put people over profits.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-b8nw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2416

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-tokg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2417

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kenneth Plum

General Comment

Please do not eliminate the State Department Blue Lantern Program in force since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-mupo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2418

Comment on DOS-2017-0046-0001

Submitter Information

Name: L.J. Coburn

General Comment

I oppose the proposed move of firearm exports from the State Department. For our and everyone's safety, we must not help arm the world further. Bad actors are a fact of life and they will ensure greater numbers of efficient killing devices will go to those intent on killing Americans, as well as their fellow citizens, further acting against our personal and national interest.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-fs8c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2419

Comment on DOS-2017-0046-0001

Submitter Information

Name: roma ramdhan

General Comment

I strongly oppose the move to make it easier for folks to get their hands on semi automatic weapons. Military style weapons does not belong in the hands of civilians

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-ttrp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2420

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Jo DuRivage

General Comment

I oppose the proposed rule to transfer oversight on small arms (firearms) exports from the State Dept. to the Commerce Dept. Commerce deals with business. The weapons should continue to be regulated by State Dept. We are not talking about normal household goods. I also oppose the elimination of Congressional oversight of commercial weapons sales of \$1 million or more.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-h0ax Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2421

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrea Charikar

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944c-u531 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2422

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristine Gentry

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944d-4lz9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2423

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary H

General Comment

If we're serious about terrorism, we need to keep the regulation of firearms export licenses in the State Department. I have the unique vantage point of being a New Yorker who lived through 9-11 and as someone whose hometown has had two school shootings, so I take this issue seriously and I'm concerned that the Department of Commerce will have more lax enforcement than the State Department.

Thanks!
Mary

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944d-35ci Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2424

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I usually try to avoid using comments that are written for masses because I worry they won't be taken seriously. I am disappointed that just about anybody in the United States can legally buy a gun that can kill multiple civilians or LEO in a matter of minutes. The idea that a rule is being considered to spread this irresponsible behavior to other countries over which we have no control and no ability to change laws is appalling. I am attaching a letter that I think should be taken very seriously because I agree with it and want to keep the world safer even as our own country goes up in flames: I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944d-7wj2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2425

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jason Eckardt

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-s1k8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2426

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Lasswell

General Comment

This move raises the threat of gun violence and danger in the US and across the world. Without State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism. The children and innocents of the world will suffer while gun lobbyists, manufacturers and the NRA will profit. I strongly oppose this unnecessary change and ask you to not approve it. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-8rza Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2427

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-oam9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2428

Comment on DOS-2017-0046-0001

Submitter Information

Name: Concerned Citizen

General Comment

I am strongly opposed to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security and eliminating congressional oversight of commercial weapons sales of \$1 million or more. This rule has one purpose only: to garner profits for a U.S. gun industry at the expense of safety for communities abroad and, potentially, our own armed service members. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for civilian use; they were designed to kill on the battlefield. Please do all you can within the State department to retain reasonable oversight of small arms trade that balances commerce with international diplomacy and national security.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944e-1dkc
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2429

Comment on DOS-2017-0046-0001

Submitter Information

Name: Megan Ball

General Comment

As an American citizen, I find it appalling that the government would consider moving this rule to the DOC. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. [2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. [3] This is highly concerning as we have already seen our current President has no consideration for human rights concerns and will happily give stuff to anyone if they pay the right amount of money.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. [4]

Some other details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. [5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking. [6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. [7] The answer is not more guns when we already have significant issues with gun violence in this country.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-n1fc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2430

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aaron Karp

General Comment

The proposed ITAR revision for firearms and ammunition promises little, and risks much. As an analyst of the global arms trade and weapons proliferation for thirty years, I recognize the transformative power of regulatory reform. But this is something else. The proposed revisions promise short-term benefits, which seem unlikely to amount to much in an already competitive global market. That makes this deregulation for the sake of deregulation itself. Meanwhile, the change unleashes three forces certain to accelerate long term American industrial decline and loss of influence over global consequences.

First, they show that the United States no longer will set global normative standards for all form of arms transfers and non-proliferation. Previously the United States Government has shown it will not further tighten restrictions. As the first outright relaxation of oversight standards in arms exports in over fifty years, the change marks a switch in policy dating from the Kennedy Administration.

Second, as the dominant player in global small arms trade, the United States has the most to lose from further loosening. As other countries emulate Americas relaxation of restrictions, not only will there be more firearms reaching more hotspots, but we can be certain the United States will see its share of a more competitive market decline. Other manufacturing countries, with lower wages and more aggressive export subsidies, are more likely to reap the seeds sown here.

Third, the change marks a fundamental shift in the nature of arms export oversight. By reducing the role of the US Government, it leaves regulation exclusively to the recipient government. This shifts the burden of proof in international human rights and state oppression, from outside powers with no direct interest in the outcome, to the recipient governments, governments that are often guilty of using imported weapons in appalling or frightful ways, ways that would be completely illegal in the United States.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-crs3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2431

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stair Calhoun

General Comment

I strongly oppose a rule change switching the regulation of firearms exports from the U.S. Department of State to the U.S. Department of Commerce. This would adversely affect our national security and would destabilize countries around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944e-sgej Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2432

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Frey

General Comment

I wonder when we're going to wake up and realize we're all connected...that we all come from Source. When are we going to stop killing each other? Is money really the only thing on Earth we care about? Is living in fear the only way we know? Now, we have to export all of that as well? What possible justification could there be for shipping out more guns other than greed? One day, our future ancestors will look back on us and think we were utterly barbaric. So very sad that we don't have the courage to have a better legacy than this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-1k07 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2433

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Sammann

General Comment

I oppose changing the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This would remove these exports from the oversight of Congress and would threaten our national security. It would facilitate exports to oppressive regimes, remove safeguards that prevent organized crime and terrorists from obtaining weapons, and fuel destabilizing violence around the world. Do NOT make this unnecessary change, which will put America at grave risk.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-j7mg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2434

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Mackem

General Comment

I'm opposed to the rule change that would switch the regulations of firearms exports from the State Dept to the Commerce Dept for the following reasons:

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-an0n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2435

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aaron Honore'

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-nbyz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2436

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gregg Slater

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-8crx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2437

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Nestler

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-aylj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2438

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sofi Milani

General Comment

I am concerned about fire arms, their increased use, their increased availability. Our country has become a nation of random acts of harm, not kindness. More restrictions, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-lfdq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2439

Comment on DOS-2017-0046-0001

Submitter Information

Name: LK Wagner

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-grn3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2440

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aileen O'Brien

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-1i1o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2441

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

There is no reason to change the rule to permit free sales of arms to foreign countries except to further enrich gun sellers. In the current system there is sufficient oversight; the Commerce Department doesn't have the means or the natural purpose to monitor and restrict sales to prevent sales to enemies of the U.S. and allies, including terrorists.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-wdwt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2442

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rosemary Gordon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would promote the sale of more guns in the world, thereby making the world less safe for all.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-4vw4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2443

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sue Mancino

General Comment

As a former Vietnam Era military spouse I oppose anything which puts our troops in danger. Therefore I oppose switching the regulation of firearms export from the U.S. State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-2ox5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2444

Comment on DOS-2017-0046-0001

Submitter Information

Name: Meredith Haines

General Comment

I am concerned that everything I have learned about this proposal is likely to make our world less safe. Keep control of this potentially dangerous situation and Congress's oversight of arms sales. State Department should maintain regulation.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944f-3wkn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2445

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Johnson

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-dpmt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2446

Comment on DOS-2017-0046-0001

Submitter Information

Name: DENISE HAWKINS

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-3pso Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2447

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Anonymous

General Comment

We need more gun regulation not less, I oppose this rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-6771 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2448

Comment on DOS-2017-0046-0001

Submitter Information

Name: S Noonan

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-f9od Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2449

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Weapons sales should absolutely be classified under 'military' and therefore be regulated by our representatives in government. Congress should have the power to regulate and block weapons sales to foreign agents in the name of national security

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-2wxa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2450

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bob Bartlett

General Comment

Expanding the sales of guns, especially semi-automatic and automatic weapons, in this country and the world is not a good idea. These weapons can fall into the hands of terrorists and used to kill innocent people. European countries, Australia, and others that limit the sale and use of these weapons have less mass shootings and gun related deaths then we do. /we need less of these weapons in the world, not more

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-rcvp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2451

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Osmundsen

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. This is a disastrous policy, and the American people will hold you accountable if it is enacted.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-fvi0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2452

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-242p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2453

Comment on DOS-2017-0046-0001

Submitter Information

Name: Don Hayler

General Comment

I oppose shifting the responsibility for gun exports from the State Department to the Commerce Department. As we've seen in recent years, armed groups around the world can cause global instability that can affect American safety. The State Department is in the best position to ensure that firearm exports do not exacerbate military situations or humanitarian crises. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-n12q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2454

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katie Snyder

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-rr5i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2455

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jackie Edmondson

General Comment

Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. The Commerce Department does not have the resources to adequately enforce export controls, therefore, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please deny the rule change (that the NRA is pushing) that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-vcge Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2456

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

THIS PROPOSAL WILL EXACERBATE THE REFUGEE CRISIS, and enable terrorists.

This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-1ir8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2457

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill Cobban

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-67c1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2458

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Westendorf

General Comment

I am opposed to this rule change! Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-40jn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2459

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elisabeth Genaux

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Thank you for taking the time to read my comment.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-dxzm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2460

Comment on DOS-2017-0046-0001

Submitter Information

Name: T. Katz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-7qp1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2461

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin Pence

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-140j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2462

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Trinkley

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-imqt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2463

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Rea

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-8s6q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2464

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mike Corn

General Comment

Seriously? The very idea of loosening any export provision on guns is absurd. This country already has a problem of too many guns, resulting in too many deaths. Do not weaken any export rules or laws. It will harm everyone involved.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-qrs9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2465

Comment on DOS-2017-0046-0001

Submitter Information

Name: Harvey Liszt

General Comment

I oppose the proposed rule that allows the freer export of arms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-1uz8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2466

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dudley and Candace Campbell

General Comment

We are writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-e4y8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2467

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary O'Neill

General Comment

We do not need more guns out there...there are enough now!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-5e7n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2468

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katherine Manners

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-d69p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2469

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Abrams

General Comment

PLEASE do not allow guns to proliferate! PLEASE do not allow guns to proliferate!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944g-m1e2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2470

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ronald Enholm

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-48wf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2471

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun-export deals, transfers the cost of processing licenses from gun manufacturers to taxpayers, and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun-export licensing from an agency with a mission to promote stability, conflict reduction, and human rights to an agency with a mission to promote trade an agency that lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human-rights violations. They should be subject to more controls, not fewer.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-aaco Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2472

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

This proposed rule is one of the most wrongheaded and misguided to emerge from the Department under the present administration.

The sale of arms abroad is far more than a business concern. Munitions exports are a matter that profoundly affects the national security of the United States and its relationships with other powers. Those concerns can and should often outweigh the commercial interests of arms manufacturers, and therefore clearly fall within the purview of the Department of State. Our international relations and relationships should not be dictated by gun manufacturers and the NRA, which would be precisely the result of the enactment of the rule.

This proposed rule is a mistake and the Department should immediately abandon it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-qx22 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2473

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angela Lancaster

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-5io1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2474

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Brown

Organization: EAB Consulting

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-mnjl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2475

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bonnie Chalek

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Bonnie Chalek

New Jersey

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-h3b5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2476

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynn Winston

General Comment

I strongly oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Lynn Winston
Carbondale, IL

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-llrj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2477

Comment on DOS-2017-0046-0001

Submitter Information

Name: Todd Thurwachter

General Comment

As a 25-year veteran of the U.S. Commercial Service, charged with promoting the export of U.S. products & services, I strongly PROTEST against this change in the approval of the export of U.S. munitions.
from

It is absolutely critical the the U.S. Department of State retain this authority, in order to balance the financial gain from export sales against our other important foreign policy concerns, such as a country's treatment of its own citizens, its commitment to human rights, rule of law, and basic, fundamental democratic principles.

Any short-term gain in export sales is not worth the wholesale abrogation of the very principles which America -- the shining city on the hill and the world's beacon of democracy -- represents to the world and for which Americans have died.

Todd Thurwachter

Foreign Commercial Service Officer, U.S. Foreign & Commercial Service, Department of Commerce
(1984-2008)

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-owts Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2478

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-tb24 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2479

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lawrence Keane

General Comment

See attached file(s)

Attachments

LGK ltr - DDTC - Proposed Rule Cats I-II-III 6 July 2018



NATIONAL SHOOTING SPORTS FOUNDATION, INC.

Headquarters: 11 Mile Hill Road, Newtown, CT 06470-2359
400 N. Capitol Street NW, Suite 490, Washington, D.C. 20001
202-220-1340 ext. 249 lkeane@nssf.org

Lawrence G. Keane

SVP Gov't & Public Affairs
Assistant Secretary & General Counsel

July 6, 2018

By E-mail:

DDTCTPublicComments@state.gov subject line, "ITAR Amendment – Categories I, II, and III"

By Internet:

Federal eRulemaking Portal: www.regulations.gov - Docket DOS-2017-0046

By Federal Mail:

Robert Monjay
Office of Defense Trade Controls Policy
Directorate of Defense Trade Controls
U.S. Department of State
2401 E. Street, N.W.
Washington, DC 20226

RE: Comments on Proposed Rule – International Traffic in Arms Regulations: U.S.
Munitions List Categories I, II, and III, 83 FR 24198 (May 24, 2018).

Dear Mr. Monjay:

The National Shooting Sports Foundation (NSSF) respectfully submits the following comments to the above-referenced Federal Register Notice. NSSF is the trade association for America's firearm and ammunition industry.¹ Formed in 1961, NSSF membership includes more than 12,000 manufacturers, distributors, firearms retailers, shooting ranges, sportsmen's organizations, and publishers. We seek to promote, protect, and preserve hunting and the shooting sports, and we offer the following public comments.

Summary of High-Level Comments

The policy justifications for the proposed rule and the corresponding proposed rule by the Commerce Department are described well on Commerce and State Department web pages at: <https://www.bis.doc.gov/index.php/forms-documents/federal-register-notices-1/2220-cats-i-iii-myths-v-facts-posted-5-24-18/file> and <https://www.state.gov/t/pm/rls/fs/2018/282485.htm>

¹ For additional information on NSSF, please see www.nssf.org.

We encourage all those reviewing the proposed rules and the public comments to read these fact sheets to learn what the proposed regulatory rationalizations of U.S. controls on the export of commercial firearms and related ammunition are and, as importantly, are not. So that the policy objectives behind the proposed changes, as well as the “myths” associated with them, are knowable to all those reviewing the proposed rules, we ask the State Department to republish their essential content in the preamble to its final rule. In this way, they will be part of the official record and help inform comments on final agency decisions made regarding the proposed rules.

As better described by these fact sheets and in the preambles to the proposed rules, commercial firearms and related items that are widely available in retail outlets that are now subject to the export control licensing jurisdiction of the State Department under the International Traffic in Arms Regulations (ITAR) on its U.S. Munitions List (USML) Categories I, II, and III would be transferred to the licensing jurisdiction of the Commerce Department’s Export Administration Regulations (EAR) in a series of new and coherently organized Export Control Classification Numbers (ECCNs). These proposed rules are the logical continuation of an effort began in 2010 under the Obama Administration to modernize the administration of U.S. export control regulations “to create a simpler, more robust system that eases industry compliance, improves enforceability, and better protect America’s most sensitive technologies.” We agree with the objectives of these bipartisan and widely supported changes. The proposed changes merely align the regulations with the nature of the items at issue, thus more efficiently accomplishing the national security and foreign policy objectives of the controls. Such changes reduce unnecessary burdens for both the U.S. Government and U.S. industry.

We have reviewed the proposed rule thoroughly with our membership. Except with respect to several of our comments set forth below, most members have told us that the final versions of the rules would eventually be beneficial because they would significantly reduce the overall burden and cost of complying with controls on the export of commercial firearms and ammunition. All who responded told us that there would be an initial short-term increase in burden and cost because of the need to re-classify thousands of commodity, software, and technology line items and SKUs affected by the new rules, but that the long-term regulatory burden reduction would significantly outweigh the short-term need to adjust internal compliance programs and practices. There would also be significant short-term costs and burdens associated with the need to become familiar with the nuances of the EAR and new BIS licensing officers. However, this burden, we believe, would be largely addressed by BIS’s long-standing commitment of industry outreach and training resources, which we appreciate. We also believe that DDTC staff will continue their robust outreach and training efforts as well.

Our members understand that there would be no change to the licensing policies for end item firearms and related ammunition. If a gun required a license to export when it was regulated by the State Department then it would require a license to export when it is regulated by the Commerce Department. If an export to a particular destination or end user would have been denied or approved before, it would be denied or approved in the same manner under the new rules. Applications would go through the same interagency review process, including by the Defense Department and also the State Department’s human rights and other experts. Under the new rules, no approvals would be converted to denials or denials to approvals.

Nonetheless, most of our members, particularly the small- and medium-sized companies, believe that the changes will be economically beneficial for them because the eventual regulatory simplification and cost reductions will allow them to consider exporting when they might not have otherwise. Those that already export believe they will be able to expand sales of exports that would have otherwise been approved. They hold these views because BIS and the EAR are simply better able to regulate commercial items than are DDTC and the ITAR. This is not meant to be a slur of DDTC staff, which is excellent. It is merely a reflection of the fact that the ITAR exists to regulate the export of defense articles that provide a significant military or intelligence advantage in a “one size fits all” type approach with regulatory requirements that are more relevant to the export of a fighter aircraft than something that can be purchased at a retail outlet. The EAR exists to regulate dual-use, commercial, and less sensitive military items that warrant control, but in more tailored ways to fit the specific national security and foreign policy, including human rights, issues posed by the items.

These conclusions have been proven thousands of times through the application of similar export control reforms for other sensitive commercial or less sensitive military items that have been transferred to Commerce’s jurisdiction over the course of the last eight years. For example, under the Commerce system, there are no fees to apply for licenses. There are no redundant registration requirements for domestic manufacturers. There are no fees for registration. Such fees are bearable for large companies, but often not for small- and medium-sized companies. The license application forms are vastly simpler. Controls on less sensitive and widely available and basic parts, components, and technology are more tailored and allow for less burdensome trade with close allies through license exceptions. Sales with regular customers can be combined in to fewer license applications, thus reducing overall paperwork to achieve the same policy objectives. **There are many other benefits to the proposed changes as well described in the proposed rules’ preambles, but our essential conclusion is that, particularly with the changes recommended below, they will lead to growth for U.S. companies, more jobs in the United States, and related economic benefits for the cities and states where the members reside while accomplishing the same national security and foreign policy objectives they have always had.**

Notwithstanding our overall approval of the proposed rules, we have the following comments and suggested edits that would make the rules even more efficient and consistent with the overall objectives of the effort.

Specific Comments

I. Proposed Changes to Brokering Provisions in ITAR Part 129

The proposed rule would add “a new paragraph (b)(2)(vii) to §129.2 to update the enumerated list of actions that are not considered brokering [activities]. This change is a conforming change and is needed to address the movement of items from the USML to the CCL that will be subject to the brokering controls, to ensure that the U.S. government **does not impose a double licensing requirement** on the export, reexport or retransfer of such items.” (emphasis supplied). The text of the proposed exception is: “(vii) Activities by persons to facilitate the export,

reexport, or transfer of an item subject to the EAR that has been approved pursuant to a license or license exception under the EAR or a license or other approval under this subchapter.”

The policy goal of not imposing double licensing obligations – i.e., the need to get a license from both State and from Commerce for the same essential transaction – is perfect. The rationalization benefits of the reform effort and the proposed rule would, of course, be ruined if, after the regulatory change, the parties involved in the same essential transaction would need authorizations from two agencies instead of one without the reform. Indeed, State created the entire paragraph (x) concept for each of its USML categories to avoid the need to get a license from State and a license from Commerce for exports that had EAR-controlled items for use in or with ITAR-controlled items in the same shipment.

The proposed (b)(2)(vii) exception text, however, would, in most cases, not eliminate the creation of a double licensing requirement because the scope of “brokering activities” requiring registration, fee payments, and licensing under part 129 includes many types of activities that occur *before* Commerce (or State under a paragraph (x) authority) would issue a license. Such activities include, with respect to the export, reexport, or retransfer of defense services, U.S.- and foreign-origin defense articles, (i) facilitating their manufacture, (ii) financing, (iii) or insuring. With respect to their purchase, sale, transfer, loan, or lease, pre-license brokering activities include (i) soliciting, (ii) promoting, (iii) negotiating, (iv) contracting for, (v) arranging, or (vi) otherwise assisting.

Thus, for example, one wanting to *promote* or *negotiate* the possible sale of a U.S.-origin firearm that transitioned to the EAR (but which would also be identified in USMIL category I(a)) would need to go through the process of registering as a broker with DDTC, pay a registration fee, and get approval from DDTC to do so. This would be a time-consuming and expensive process – and an effort that would become completely moot under the new (b)(2)(vii) exception if and when Commerce later issued a license to the exporter to allow the export of the firearm being promoted or subject to the negotiations.

We can infer why DDTC proposed this provision, which is to ensure that it is able to review and approve brokering activities before an application is submitted because it will not necessarily know then that the license would be approved later. We recognize that brokering activities are separate controlled events from the act of exporting, reexporting, or retransferring an article. Nonetheless, we respectfully submit that for items that would become subject to the EAR (and also identified on the relevant USMIL categories), maintaining this distinction is over-cautious, creates unnecessary regulatory redundancies, and does not advance the policy objectives of the control.

First, the vast majority of licenses for the export of commercial firearms and related items are and would likely continue to be approved without issue. With respect to those licenses that are not approved, the U.S. Government would still get the final say in the act that really matters from a policy and control point of view, which is the actual shipment of the firearm or other controlled item. Thus, the double burden the proposed approach would impose does not seem warranted because the U.S. government will be able to accomplish its ultimate policy objectives at the end of the day by approving, denying, or approving with conditions the actual movement of the

firearm or related item. This would not be the case for items that would not be subject to the EAR.

RECOMMENDATION I: Thus, to accomplish DDTC's policy objectives without creating the possibility of authorization requirements from two agencies, we suggest that the scope of the brokering obligations over items no longer described on the USML but still described on the relevant USMIL categories (i.e., I(a)-(c), II(a), and III(a)) apply only to such items that are not "subject to the EAR." In this way, DDTC would have control over brokering activities over such items in situations where the U.S. Government would not otherwise have jurisdiction over their later reexport or transfer, such as non-U.S. origin items meeting the description of items proposed to move from USML Categories I-III that would also meet the description of items currently on the USMIL's Category I-III. (Again, for all items that are "subject to the EAR," the US government will still be able to regulate the transaction.) To accomplish this relatively simple solution, a suggested edit to the proposed exception paragraph (b)(2)(vii) is:

"(vii) Activities that would or could result in the export, reexport, or transfer of an item 'subject to the EAR.'"

An even simpler approach would be:

"(vii) Activities that involve items 'subject to the EAR.'"

If there were a violation of the EAR later, such as a violation of the terms of a license, then that would be prosecuted in the ordinary course. If DDTC also wanted enforcement authority over brokering violations in connection with a later export in violation of the EAR, it could insert at note along the lines of the following:

"Note to paragraph (b)(2)(vii): This exclusion from brokering activities for items subject to the EAR does not apply if the activities were part of a conspiracy to violate of the EAR."

We are confident that DDTC and the other agencies reviewing this comment may come up with other ideas. We would be open to them so long as they would eliminate the need for parties to get both a State and a Commerce authorization for the same basic transaction. Otherwise, the new rules would largely defeat one of the primary benefits of the proposed regulatory change, which is the consolidation within the Commerce system of control over the commercial firearms and related items that no longer warrant control on the USML.

II. USML Category III Ammunition – Projectiles – Pyrotechnic and Steel Tipped

The revised Category III enumerates pyrotechnic material in several subparagraphs. Subparagraph (a)(1) controls "Ammunition that **incorporates a projectile controlled in paragraph (d)(1) or (3) of this category,**" and subparagraph **(d)(1)** controls "Projectiles that use **pyrotechnic tracer materials** that incorporate any material having peak radiance above 710 nm or are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one

or a combination of the following: tungsten, steel, or beryllium copper alloys.” (emphasis supplied).

The revised category is specific in that it only controls ammunition or projectiles with pyrotechnic material “having peak radiance above 710 nm”. This indicates that the control is limited to tracer compositions meant for use with night vision optics rather than controlling all tracers. We agree with this approach. Bright tracers have been used for sporting purposes for years to assist shooters in targeting and marksmanship, and therefore as a dual use item are more correctly controlled on the CCL.

However, there is confusion and possible overlap of controls with regard to subparagraph (a)(6), which controls “**Ammunition employing pyrotechnic material in the projectile base and any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems.**” (emphasis supplied).

The first half of this sentence does not include reference to the radiance parameter of “above 710 nm” and indicates control of **any** ammunition with pyrotechnic material in the base. Since all tracer ammunition is manufactured with “pyrotechnic material in the projectile base,” it is not necessary to designate a separate control for ammunition with pyrotechnic material in the base. And, subparagraphs (a)(1) and (d)(1) already control these articles and include the radiance parameter of “above 710 nm.”

The second half of the sentence articulates controls on “any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems.” Since peak radiance above 710 nm is required for tracer ammunition to be suitable for use in night vision devices, having another control separately enumerated in (a)(6) seems redundant.

RECOMMENDATION II.A.: We request DDTC to review subparagraph (a)(6) for possible deletion for the reasons stated above.

Subparagraph (a)(3) controls “Shotgun ammunition that **incorporates a projectile controlled in paragraph (d)(2)** of this category, and subparagraph (d)(2) controls “Shotgun projectiles that are flechettes, incendiary, tracer, or explosive.”

Subparagraph (d)(2) does not include any reference to the parameters included in (a)(6) and (d)(1) i.e. “pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm”. Shotgun ammunition with tracer material is being produced for sporting use by a Sporting Arms and Ammunition Manufacturers’ Institute member company.

RECOMMENDATION II.B.: We recommend that subparagraph (d)(2) be revised to delete the word “tracer” and replace it with the phrase “that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm” for the reasons explained above and to make subparagraph (d)(2) consistent with the parameters in subparagraph (d)(1).

Subparagraph (d)(1) also controls “Projectiles that are incendiary, explosive, **steel tipped**, or contain a core or solid projectile produced from one or a combination of the following: tungsten, steel, or beryllium copper alloys.” (emphasis supplied).

Steel tipped projectiles are used in armor piercing ammunition. Unlike the federal definition of “armor piercing ammunition,” the revised Category III does not exempt ammunition that the ATF has found is primarily intended to be used for “sporting purposes” per the below definition:

In 18 USC 918(a)(17)(A), the term “ammunition” means ammunition or cartridge cases, primers, bullets, or propellant powder designed for use in any firearm.

(B) The term “armor piercing ammunition” means—

(i) a projectile or projectile core which may be used in a handgun and which is constructed entirely (excluding the presence of traces of other substances) from one or a combination of tungsten alloys, steel, iron, brass, bronze, beryllium copper, or depleted uranium; or (ii) a full jacketed projectile larger than .22 caliber designed and intended for use in a handgun and whose jacket has a weight of more than 25 percent of the total weight of the projectile.

(C) The **term “armor piercing ammunition” does not include** shotgun shot required by Federal or State environmental or game regulations for hunting purposes, a frangible projectile designed for target shooting, **a projectile which the Attorney General finds is primarily intended to be used for sporting purposes**, or any other projectile or projectile core which the Attorney General finds is intended to be used for industrial purposes, including a charge used in an oil and gas well perforating device.

RECOMMENDATION II.C. We recommend that subparagraph (d)(1) be revised to delete the term “steel tipped.” Export controls of articles enumerated in the revised Category III should be consistent with definitions in other parts of federal law. Therefore control of steel tipped projectiles which have been determined to be intended for sporting purposes correctly belongs under the EAR.

III. Recommendations for Effective Date of Final Rule and Allowance for Manufacturing Registrations

RECOMMENDATION III.A. NSSF recommends a 180-day effective date for the final rule. Throughout the Export Control Reform initiative and during transition from the USML to the CCL, the final rule for many other categories had an effective date of 180 days after publication. This gave exporters of those commodities sufficient time to reclassify their products and implement changes in their enterprise systems to become compliant with the EAR. The later effective date also allowed those companies to continue to obtain export licenses from DDTC without loss of business in the interim. The regulatory change for firearms and ammunition will impact many exporters and involve a significant number of export licenses. Most of these companies have had no exposure to the EAR and will require significant training and outreach to understand the new regulations. The extended effective date will allow these firearm and

ammunition exporters sufficient time to learn and implement EAR-centric processes and procedures while still continuing to do business.

RECOMMENDATION III.B. Although the extended period will be beneficial to exporters, it may present issues for small manufacturers and gunsmiths that do not export but are nonetheless required to register with DDTC. Some of these companies may have registration expiration dates within the period prior to the effective date, forcing them to renew a registration which would no longer be required a short time later. Therefore, we also request DDTC make allowance for registration renewal during the 180-day period by extending the expiration dates until after the effective date of the final rule.

IV. Recommendation for Transition of Sound Suppressors to the CCL

NSSF respectfully requests DDTC consider transitioning control of sound suppressors from the USML to the CCL. At a minimum, NSSF requests DDTC to reconsider the current restrictive policy and allow for commercial exports of these items. The proposed rule retains control of silencers, mufflers, and sound suppressors under USML Category I(e). The current DDTC policy restricts exports of these articles to government and law enforcement agencies only. This policy has been in place for more than 15 years, and is largely out of date with the current worldwide sale and use of suppressors for commercial, sporting and hunting purposes.

Suppressors are a simple design consisting of a casing which contains material to absorb some of the gases from escaping from behind the projectile once it leaves the barrel. Suppressors have only a very limited and specialized military utility. The benefit of a suppressor is that it muffles the sound of the shot to a certain extent. The detriment of using a suppressor is that the projectiles lose both range and penetration. And the more effective the sound suppression is, then the less effective the projectile. In fact, government and law enforcement usage of suppressors is limited to special operating units and such.

However, sporting and hunting use of suppressors has been growing for many years. The largest international commercial suppressor markets are the United Kingdom and New Zealand, with smaller markets throughout Europe. In these countries, there are restrictions on how suppressors can be used. For example, in Norway suppressors can be used for hunting only when hunters are a certain distance away from residential areas. In the UK, suppressors are used with 99% of rifles and are considered a good solution to the problem of noise pollution. There were 154,958 firearm certificates on issue by the end of March 2017, representing a total of 559,302 firearms, which is an increase of 4% compared with the previous year. In New Zealand, suppressor ownership and use is legal with no special permit required. Most .22LR rimfire rifles are sold with threaded muzzles for suppressor use. The majority of rimfire suppressors are sourced from China which sells these items for approximately US\$6.00 with an estimated landed cost of US\$10 each. Suppressors for centerfire rifles are gaining in popularity, and local production in NZ is increasing with one-third of NZ produced suppressors being exported to the UK and Europe. The average price for these centerfire suppressors is approx. US\$360.

Within the US, the sporting and hunting use of suppressors has kept to the same trend as the international markets. There are 1.4 million suppressors registered in the U.S. as of April 2017. Our source is the ATF's annual Firearms Commerce in the U.S. publication exhibit 8, page 15: <https://www.atf.gov/resource-center/docs/undefined/firearms-commerce-united-states-annual-statistical-update-2017/download> The 2017 figure is triple the number of registered suppressors as of April of 2013 which was 494,452 units. And the movement of suppressors from the USML to the CCL will have no effect on domestic registration which will still be required.

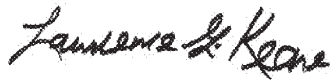
Based on the above data regarding the predominant commercial use of suppressors both in the US and overseas, and in comparison to the limited use of suppressors by select groups in the military or LE, we estimate that there are more suppressors being used now for hunting and sporting purposes than for military or law enforcement purposes. These articles can no longer be considered as having a critical military advantage with such widespread foreign availability. The only effect of restricting U.S. exports of suppressors to government or law enforcement agencies is to block U.S. manufacturers and exporters from participating in these legal and growing foreign markets. This is unfair for U.S. manufacturers who are not allowed to compete with foreign producers. If these articles are legal to own and to use commercially in the foreign country, then DDTC should allow for their export from the U.S.

In addition, there is no technology required or in use that warrants the stricter protections of the AECA. Because of the growing dual-use nature of these articles, export controls more correctly belong under the CCL. Controls on suppressors on the EAR would include both "NS" (national security) and "CC" (crime control), and licensing would still be required, but with allowance for exports intended for sporting and hunting purposes.

* * *

We appreciate your consideration of our comments. We would be happy to respond to any questions or concerns, or provide additional information. I can be reached at lkeane@nssf.org.

Sincerely,

A handwritten signature in black ink that reads "Lawrence G. Keane". The signature is written in a cursive, flowing style.

Lawrence G. Keane

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-m15m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2480

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people everyday around the world. They should be subjected to more controls not less. The proposed change in regulations will make the world a far more dangerous place. The proposed rules look to be a for profit act for arms dealers and will do nothing for humanity nor the planet. The bottom line is that switching the regulations of firearms from the State Department to the Commerce Department will facilitate exports to oppressive regimes removing safe guards that keep these crime infested terrorist organizations from obtaining weapons which destabilize countries and cause mass migrations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-gjx7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2481

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Sammartano

General Comment

I am writing in opposition to the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Currently, firearms exports are classified as military. For this reason, they are under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would have the following negative consequences:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms.

Firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-jwnc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2482

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rita Egrari

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-t5ic Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2483

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Fisher

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-bm5a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2484

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deanna Kizis

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-uyoa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2485

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I OPPOSE any legislation that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. DO NOT ALLOW THIS TO HAPPEN.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-u3m7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2486

Comment on DOS-2017-0046-0001

Submitter Information

Name: Celia Taghdiri

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-ltzd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2487

Comment on DOS-2017-0046-0001

Submitter Information

Name: Withheld Withheld

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-h51a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2488

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Handley

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944h-ghfn
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2489

Comment on DOS-2017-0046-0001

Submitter Information

Name: winifred Hopkins

General Comment

I oppose the proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and powerful firearms from the U.S. State Department to the U.S. Commerce Department

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-rtws Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2490

Comment on DOS-2017-0046-0001

Submitter Information

Name: ANONYMOUS Anonymous

General Comment

SDEMI-AUTOMATIC RIFLES ARE MILITARY AND SHOULD NEVER BE EXPORTED NO
MATTER WHAT THE NRA SAYS

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-jhwc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2491

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Heagstedt

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-6ptp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2492

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Sowerwine

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-lph4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2493

Comment on DOS-2017-0046-0001

Submitter Information

Name: Malcolm Kenton

General Comment

I write to express strong opposition to a proposed rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This rule change would endanger our national security and set a dangerous precedent.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would also remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I look forward to seeing this proposed change scrapped.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-6v9u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2494

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia Tuthill

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rule's elimination of congressional oversight of commercial weapons sales of \$1 million or more has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobby's influence in the rule's description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-bcgk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2495

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Serra

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-eqnu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2496

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Bekavac

General Comment

I am writing to OPPOSE the transfer of authority over arms exports to the Department of Commerce from the State Department. As a resident of the District of Columbia, I have no voting representative in the Congress, so I am making my voice heard directly, here and now.

Firearms are the instrumentalities of war: war is evil, and the best way to avoid it is to undertake to understand and combat the sources of war. Treating the export of firearms as a mere form of commerce is shortsighted, stupid and vile. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I have seen war in Vietnam as a journalist; I have tried to combat its aftereffects in the Balkans. Particularly in the latter, control of arms would have limited, to some extent, the predations on the civilian populations. I am utterly opposed to this change: keep firearms export controls in the hands of diplomats, not salesmen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944h-x6xs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2497

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Dodd

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-7mx1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2498

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lauren Linda

General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-jwhc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2499

Comment on DOS-2017-0046-0001

Submitter Information

Name: Francine Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-e0f9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2500

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marcia Crosbie

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-urxa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2501

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Patterson

Organization: Sporting Arms and Ammunition Manufacturers' Institute

General Comment

See attached file(s)

Attachments

DDTC Letter Docket DOS-2017-0046 6 July 2018



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.
SINCE 1926

July 6, 2018

By E-mail: DDTCPublicComments@state.gov subject line, "ITAR Amendment – Categories I, II, and III"

By Internet: Federal eRulemaking Portal: www.regulations.gov - Docket DOS-2017-0046

Directorate of Defense Trade Controls
U.S. Department of State
2401 E. Street, N.W.
Washington, DC 20226

REFERENCE: Proposed Rule – International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III,

Dear Sir:

The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) respectfully submits the following comments to the above referenced Federal Register notice of proposed rulemaking 83 FR 24198, dated May 24, 2018. SAAMI is an association of the nation's leading manufacturers of firearms, ammunition and components, and an American National Standards Institute (ANSI) accredited standards developer. SAAMI was founded in 1926 at the request of the federal government and tasked with creating and publishing industry standards for safety, interchangeability, reliability and quality, coordinating technical data and promoting safe and responsible firearms use.

As the organization responsible for creating manufacturing standards for the firearm and ammunition industry, SAAMI is uniquely qualified to provide technical expertise on this matter. We have reviewed the proposed rule, and agree in general with the transition of the majority of firearms and ammunition to the Commerce Control List. Export controls of commercial firearms and ammunition which are not inherently military, have no critical military or intelligence advantage, and have predominant commercial applications correctly belong under the Export Administration Regulations (EAR).

We would like to raise the following points regarding several items enumerated in the revised Category III — Ammunition and Ordnance and ask for revision or reconsideration.

Pyrotechnic Tracer Materials

1. Subparagraph (a)(1) controls "Ammunition that incorporates a projectile controlled in paragraph (d)(1) or (3) of this category," and subparagraph (d)(1) controls "Projectiles that use pyrotechnic tracer materials that incorporate any material having peak radiance

above 710 nm or are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one or a combination of the following: tungsten, steel, or beryllium copper alloys.”

Subparagraph (a)(6) controls “**Ammunition employing pyrotechnic material in the projectile base** and any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm and designed to be observed primarily with night vision optical systems”.

By including the peak radiance parameter of “above 710 nm”, we note DDTC’s intention to control only tracer compositions that emit primarily in infrared which are for use with night vision devices. Such dim tracers, with infrared wavelengths from 710 nm to 1 millimeter, burn very dimly but are clearly visible through night vision equipment. This differentiates from bright tracers, which are the most common type of tracer, or subdued tracers, both of which can overwhelm night vision devices, rendering them useless.

Small arms tracer ammunition that includes pyrotechnic material below peak radiance of 710 nm has been sold commercially for sporting purposes for many years. For example, it is used as a training aid for marksmanship proficiency. We agree with the proposed rule which would maintain control on the USML of dim tracer ammunition with peak radiance above 710nm.

However, we wish to comment on the following:

- a. In subparagraph (a)(6) the radiance parameter of “above 710 nm” is not applied to the first part of the control sentence. As currently written, the phrase “ammunition employing pyrotechnic material in the projectile base” would be interpreted to include all tracer ammunition because the radiance parameter “above 710 nm” is not present in the phrase. Also, pyrotechnic tracer material is only employed in the projectile base, and therefore it is not necessary to enumerate a separate control specifying “pyrotechnic material in the projectile base”.
- b. We note some overlap in controls in subparagraphs (a)(1) and (a)(6). Subparagraph (a)(1) controls ammunition with projectiles controlled in subparagraph (d)(1) which includes “projectiles that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm”, i.e. tracer projectiles. Subparagraph (a)(6) controls “...any ammunition employing a projectile that incorporates tracer materials of any type having peak radiance above 710 nm” which is already controlled in (a)(1) with reference to (d)(1). The only differentiation we note would be reference to ammunition “designed to be observed primarily with night vision optical systems”.

RECOMMENDATION: We recommend subparagraph (a)(6) be revised to delete the phrase “ammunition employing pyrotechnic material in the projectile base”. First, it is not necessary to articulate pyrotechnic material in the projectile base, and deletion of this phrase would remove the confusion that (a)(6) controls all ammunition with pyrotechnic

material including that with peak radiance below 710 nm. Second, the phrase is redundant since such ammunition with pyrotechnic material is controlled under (a)(1). We also request DDTC to provide clarification on which articles would be individually controlled under subparagraphs (a)(1) and (a)(6) since both control ammunition with pyrotechnic/tracer projectiles with a radiance parameter intended for use with night vision devices.

2. Subparagraph (a)(3) controls “Shotgun ammunition that incorporates a projectile controlled in paragraph (d)(2) of this category”, and subparagraph (d)(2) controls “Shotgun projectiles that are flechettes, incendiary, tracer, or explosive.”

We note that this paragraph does not include the parameter “pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm”. A SAAMI member company is currently producing shotgun ammunition with tracer projectiles for commercial use.

RECOMMENDATION: We reiterate our comments above regarding tracer ammunition, and recommend subparagraph (d)(2) be revised as follows: “Shotgun projectiles that are flechettes, incendiary, explosive, or that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm.” This change would make subparagraph (d)(2) consistent with the parameters in subparagraph (d)(1).

Non-metallic Cases

Subparagraph (a)(5) lists “Ammunition, except shotgun ammunition, based on non-metallic cases, or non-metallic cases that have only a metallic base, which result in a total cartridge mass 80% or less than the mass of a brass- or steel-cased cartridge that provides comparable ballistic performance.” Subparagraph (d)(8) controls “Non-metallic cases, including cases that have only a metallic base, for the ammunition controlled in paragraph (a)(5) of this category.”

This control would include plastic cartridge cases that fit the mass parameters shown. Polymer-cased ammunition (PCA) is currently sold to consumers in the commercial market, and is increasing in popularity. It is considered an alternative to reduce cost and weight in ammunition. This type of ammunition has a significant benefit to the environment and to firearm ranges by reducing both waste and the environmental impact and footprint of hunters and shooters. Controlling PCA under the ITAR would hinder further technological development in this area.

We recommend that control for non-metallic ammunition be removed from the USML and transitioned to the CCL to be controlled with similar metallic cartridge ammunition. Non-metallic cased ammunition is in development by several SAAMI members for sporting and hunting purposes. PCA meets SAAMI specifications for ballistic performance. Revised Category III should only include articles which are inherently military, and PCA does not meet that definition. New ECCN 0A505 on the CCL will control metallic cartridge ammunition (e.g. .308 Winchester) regardless of whether it is used in semi-automatic rifles for sporting use, or in

full-automatic rifles for military use. Therefore, controls for non-metallic cartridges should be the same. To effect this change, we recommend deletion of subparagraphs (a)(5) and (d)(8).

Primers

Subparagraph (d)(10) controls "Primers other than Boxer, Berdan, or shotshell types."

This description appears to except all primers used by SAAMI members. We believe DDTC's intent here is to control tubular primers used in medium or large caliber ammunition, which SAAMI members do not use in the manufacture of ammunition for sporting arms. We suggest that the designation of primer types could be simplified. Boxer, Berdan, shotshell and muzzleloading percussion caps are all called "cap type" primers by the Department of Transportation, and are classified as UN 0044, "Primers, cap type." We recommend DDTC consider using this description to define primers which would not be controlled on the USML.

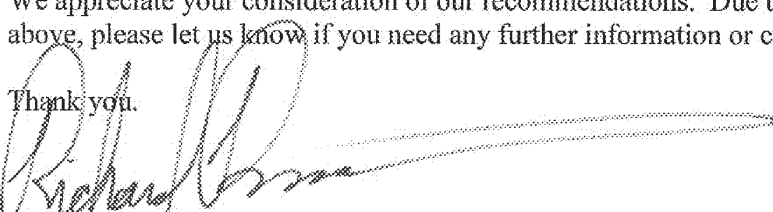
Technical Data

Subparagraph (e) controls technical data and defense services directly related to the defense articles enumerated in paragraphs (a), (b), and (d) of this category.

This exemplifies the need to make the changes we recommend above regarding pyrotechnic tracer material and non-metallic cases. Technical data related to these items is already in the public domain and well-known. Therefore, it should not be controlled on the USML.

We appreciate your consideration of our recommendations. Due to the technical nature of the above, please let us know if you need any further information or clarification for your review.

Thank you.



Richard Patterson
Executive Director

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-81vf Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2502

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jen Grady

General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-3a7w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2503

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gunnar Madsen

General Comment

Firearms are military, and their export and oversight should be governed by the State Department, which has the knowledge and expertise to know when and where exports are acceptable.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-ip8f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2504

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Joyner

General Comment

The NRA is one of the most powerful and destructive entities in the US, and look at what it has done to this country. Please do not let them expand their influence and destructive activities to the global scene by letting them shift to the Dept. of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944i-gtzz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2505

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Joyner

General Comment

PLEASE DO NOT ALLOW THE NRA TO BECOME THE WORLD'S BIGGEST ARMS DEALER
BY REMOVING THE REGULATION FROM THE STATE DEPT. TO THE COMMERCE DEPT.
THE PLANET DOES NOT NEED MORE GUNS FROM THE USA.
Pamela Joyner

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-o4i3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2506

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Mundal

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-iwoj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2507

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nora Polk

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-9etj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2508

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeffrey Cohen

General Comment

I strenuously oppose this rule change, believing that we need fewer guns in the world, not more.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-uf52 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2509

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Reiter

General Comment

This comment is strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. All we need is for the guns to easily get into the hands of people who are violent and want to hurt other people and Americans. The Commerce Department is not in the business of National Security and all sales should be questioned.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-ruhn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2510

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Francisco

General Comment

I am writing to oppose this rule change. I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I am concerned that the Commerce Department does not have the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-lfwj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2511

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jan Replogle

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-ipsv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2512

Comment on DOS-2017-0046-0001

Submitter Information

Name: Raksha Krishna

General Comment

I am a very concerned citizen who is very opposed to this proposed rule regarding gun exports. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less. This rule if approved will limit or even eliminate end user controls, cost the tax payers, remove Congressional oversight, transparency while encouraging more gun production. I earnestly request that this proposed regulation not move ahead.

Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-p8dv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2513

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frank Evelhoch, II

General Comment

First let me say that this is a totally crazy idea that's proposed. I personally like the fact that with the State Department in control of the the semi-automatic assault and other powerful weapons export licenses that Congress is always notified of sales of large numbers of these types of weapons to foreign countries and can override the sale if needed.

Here are 3 ways that I see this rule change as being harmful to the welfare of all US citizens:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944j-t3k9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2514

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jason Green

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-k1jq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2515

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bhuvanesh Bhatt

General Comment

The proposed rule change does the following and is unacceptable:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please reject this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-3ltk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2516

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Cooper

General Comment

The proposed rule should not be allowed, because:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-bizt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2517

Comment on DOS-2017-0046-0001

Submitter Information

Name: Manny Garcia

General Comment

ENOUGH OF THE CARNAGE!!!!!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-owek Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2518

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Braatz

General Comment

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-c2v8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2519

Comment on DOS-2017-0046-0001

Submitter Information

Name: Manny Garcia

General Comment

ENOUGH OF THE CARNAGE!!!!!!
THIS HAS TO STOP!!!!!!

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944k-r92r
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2520

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Cato

General Comment

I oppose the DOS proposed rule on international traffic in arms regulations for US munitions list categories I, II & III. On May 24, the Trump administration proposed to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. Action under the rule if it is enacted will endanger lives merely to enrich munitions dealers. The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually, but the Commerce Department does not have the resources to enforce export controls, even now.

The proposed rule change:

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7.Reduces transparency and reporting on gun exports.
- 8.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-84fe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2521

Comment on DOS-2017-0046-0001

Submitter Information

Name: Herman Rhein

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944k-mxb3
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2522

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Bartlett

General Comment

I strenuously object to any action of my government that makes the distribution of military style weapons - or for that matter ANY weapons - easier than it currently is. Our nation does not need to be exporting the violence that our gun culture causes here to infest other nations. The current proposal to shift control to the Commerce Department blatantly prioritizes gun dealer and manufacturer profit over civilization and safety.

The current proposal:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

I do not want my country to stand before the world as preferring money to human rights!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-qsbl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2523

Comment on DOS-2017-0046-0001

Submitter Information

Name: P. Quillian

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-vyc3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2524

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Infantino

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

We do not want to make it easier for terrorists to purchase US firearms and use them against their own people or the United States.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-zpme Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2525

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Wimmer

General Comment

Exporting our sick policies supported by the NRA - a gun in every hand - is the worse idea to ever be even suggested! This absurd rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-jh05 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2526

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill Holt

General Comment

Do not allow the export of more firearms. The world is already bleeding from US made firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-u1pe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2527

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beth Katz

General Comment

See attached file(s)

Attachments

Beth Katz Public Comment on State Dept ITAR USML Cat I-III

July 6, 2018

To: Office of Defense Trade Controls Policy, U.S. Department of State
Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of Commerce

In Reference to **FRN 2018-10366** (State) and **83 FR 24166** (Commerce).

I am writing to express my opposition to the proposed regulatory changes published in the Federal Register on May 24, 2018, as "International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III" (DOS FRDOC_0001-4527) and "Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)" (83 FR 24166). The proposed changes raise significant concerns for me as a parent, as an American citizen and taxpayer, and as someone who has studied and wrote my graduate thesis on the international small arms trade.

As a parent of a young child, I am deeply concerned about the impact that these changes will have on both global and domestic security for the foreseeable future. The proposed changes would greatly diminish oversight of the export of semi-automatic assault weapons, high capacity ammunition clips and training on such military equipment. The suggested changes would make it more likely that these dangerous weapons will end up in the hands of traffickers, terrorists or cartels and used against US service members. This increases the likelihood for greater destabilization and conflict worldwide as well as for these weapons to be trafficked back into the U.S. for nefarious uses here. The new rule also removes the block on 3D printing of firearms. This will facilitate unregulated gun production in the U.S. and abroad by making it possible for anyone, anywhere, with access to a 3D printer to produce a lethal weapon. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, these changes could generate many preventable tragedies. These proposed changes will create a world that is less safe for my son and other children to grow up in and to live; and therefore should not be adopted.

As an American citizen, I believe that these proposed changes diminish U.S. credibility in the eyes of the international community and compromise our global leadership. The proposed changes call for transferring gun export licensing from the State Department, an agency with a mission to promote stability, conflict reduction, and human rights, to the Commerce Department, an agency with mission to promote trade. In doing this, we are retreating on our global commitment to human rights and acting as though the export of firearms is just another commodity when the impact of these weapons is far more consequential and deadly. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research shows that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are sought out weapons used by criminal organizations in Mexico and other Latin American countries to perpetrate most of the increasing and record levels of homicides in those countries. The U.S. should not be adopting policies like the proposed changes which amplify this. Rather, we should be working collaboratively, as we have under previous administrations, to find ways to prevent and reduce firearms from being used to carry out human rights violations and crime.

As a U.S. taxpayer, I also find these proposed changes to be fiscally irresponsible. The new rule would transfer the cost of processing licenses from gun manufacturers to U.S. taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of

tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and the Commerce Department does not charge any fee for licensing. This means that U.S. taxpayers, such as me, will absorb the cost of reviewing applications and processing licenses rather than the gun exporters that benefit from these sales. In addition, U.S. taxpayers also will need to shoulder the costs of having to build the capacity and expertise of the Commerce Department to properly administer the proposed changes. The Commerce Department currently does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce (see Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf>). The Commerce Department's Bureau of Industry and Security's enforcement office, who would be charged to oversee the new changes, does not have staff in Latin America, Africa, or many other parts of the world and is not equipped to take the same level of preventive measures for end-use controls. In stark contrast, the State Department, who oversees these items while they reside on the USML, has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. The Commerce Department does not have these resources and developing them will come at a substantial cost to U.S. taxpayers.

Finally, as someone who has studied and researched the international small arms trade, I can confidently say that greater regulation, not less as the proposed rule would enable, is needed to curb the disproportionate impact that these weapons have on fueling conflict, terrorism, and crime around the world. One particularly troubling part of the new rule is its reduction of end-use controls for gun exports. It would eradicate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department within State that compiles the U.S. Government's information on human rights violations, decreasing the ability to effectively stop weapons licenses from going to international human rights violators. End-use controls also are weakened by removing the registration of firearms exporters, a requirement since the 1940s. Under the current rules, registration of exporters lets the State Department check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. Migrating the licensing to the Commerce Department will remove new exporters and brokers of these firearms from the State Department database, losing an important part of the evidentiary trail that enables the prosecution of arms traffickers.

It is for all the reasons listed above that I urge you to reject the proposed changes and to keep the items currently listed on the State Department-administered US Munitions List (USML) intact.

Thank you for your time and consideration.

Sincerely,

Beth Katz
Omaha, Nebraska

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-klj0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2528

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Fehr

General Comment

The proposed change from the State Department to the Commerce Department overseeing the exports of firearms is a change from a department that has the necessary staff, knowledge and experience to properly handle such exports to an department which has neither the necessary staff, knowledge and experience and the consequences will be fraught with problems.

In addition as the NRA is in favor of this proposed change it should be a concern the prime motivation is for further accelerated proliferation of guns and greater profits for gun manufacturers, along with increased violence and mayhem in the rest of the world.

Thus, this change has no merit and must be summarily rejected.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-n73y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2529

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose the proposed rule change. It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. In addition, it eliminates Congressional oversight for important gun export deals and transfers the cost of processing licenses from gun manufacturers to taxpayers.

The Commerce Department does not have the resources to enforce export controls, even now, and this proposed rule change would transfer gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. (!)

Please do not approve this rule change. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-k9ee Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2530

Comment on DOS-2017-0046-0001

Submitter Information

Name: Penelope Okamoto

General Comment

American has seen the bloody and horrifying cost of unregulated guns in our country. The rest of the world must not suffer needless injuries and death from gunshot wounds simply so American gun manufacturers can make more money.

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change eliminates necessary Congressional oversight for important gun export deals; places the cost for processing licenses on the taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change benefits the profits of American gun makers at the cost of lives around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-xcgj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2531

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cindy Samuelson

General Comment

I object to the proposed rules:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-kzdz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2532

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanne Collins

General Comment

I oppose a rule change that would switch the regulations of firearms export from the State Department to the Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-fivt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2533

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Stern

Organization: Glenwood Management Corp.

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-bm3k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2534

Comment on DOS-2017-0046-0001

Submitter Information

Name: Drs. James and Judith Lanfrey

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-ivdm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2535

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine De Angelis

General Comment

There is no need to impose our 'gun culture' on other countries. In fact, it is far beyond time to repeal the 2nd Amendment as it pertains to private citizens.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-zfqm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2536

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jerry Bass

General Comment

Do not change the rules on exporting firearms for these reasons.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-pdck Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2537

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Arnold

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-41h5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2538

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna Schmidt

General Comment

I could not be more vehemently opposed to this!! Making it easier for people around the world to have dangerous weapons is, at the least, counterintuitive!! We are already suffering from our mistakes with guns being trafficked to Mexico and Latin America, resulting in the migration of those seeking asylum in the U.S. to escape the violence of gangs and cartels. Let's learn from these and other mistakes, such as arming the Afghans many years ago!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-2bz8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2539

Comment on DOS-2017-0046-0001

Submitter Information

Name: Meha Kamdar

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-q0nn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2540

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Cole

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. That would endanger our country just to provide increased profits for weapons manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-v4jo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2541

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Schmidt

General Comment

I oppose this change for the following reasons:

1. Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
2. Eliminates Congressional oversight for important gun export deals.
3. Transfers the cost of processing licenses from gun manufacturers to taxpayers.
4. Removes statutory license requirements for brokers, increasing risk of trafficking.
5. Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
6. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
7. The Commerce Department does not have the resources to enforce export controls, even now.
8. Reduces transparency and reporting on gun exports.
9. Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-yh47 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2542

Comment on DOS-2017-0046-0001

Submitter Information

Name: Penny Babus-Schmidt

General Comment

We must stop the sale of arms!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-xg10 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2543

Comment on DOS-2017-0046-0001

Submitter Information

Name: L. Simmons

General Comment

I am strongly opposed to the proposed rule changes for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-vfko Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2544

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dave Mills

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-jbla Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2545

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Leib

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would also:

- 1) Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) Remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-l40f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2546

Comment on DOS-2017-0046-0001

Submitter Information

Name: Douglas McKee

General Comment

Transferring international gun sales to the commerce department is a bad idea. No need to export our gun problems to other countries just because the NRA says you should.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-5854 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2547

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin Reed

General Comment

I am absolutely against this. This is a complete threat to national security. DO NOT allow this to happen

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944k-g5my Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2548

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stanley Wright

General Comment

I am against any and all changes, moves from one agency, that is for the protection of citizens, to another agency that only wants to give extreme monetary gain to gun makers and sellers, with no thought of the possible threat to thousands of innocent peoples lives! Also, the dropping of non- automatic ASSAULT-RIFLES and the LARGER SIZED CLIPS, by their names alone point to their military use, and not to their use for hunting, unless you want to add that hunting and killing whole herds of deer, elk, mountain goats, moose, bears etc. is what you call hunting! There has always been a limit to the number of animals hunted by individual hunters. The word, Assault, used with any guns, has the meaning of attacks upon groups, or masses of individual beings, and those beings are most likely to be humans, there-fore, it is a weapon of mass killing, or murder, if used with regular citizens, as the perpetrator. The complete, Trump Proposal, should be dropped in the nearest trash bin!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-3w5p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2549

Comment on DOS-2017-0046-0001

Submitter Information

Name: Inge Johnsson

General Comment

I am very concerned about the proposed change to easier to spread murder weapons legally across the world, just because the gun industry wants to make more profit. This is not in our interest as a nation, to be complicit in increasing homicide rates abroad. Some of the reasons to not approve this proposed rule change are:

- 1) Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2) Eliminates Congressional oversight for important gun export deals.
- 3) Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4) Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5) Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6) Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7) The Commerce Department does not have the resources to enforce export controls, even now.
- 8) Reduces transparency and reporting on gun exports.
- 9) Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Thanks for this opportunity to share my views as a citizen and voter, and to allow me to express my desire to make the world a safer place, not one where firearms end the lives of thousands every year.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-tbs6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2550

Comment on DOS-2017-0046-0001

Submitter Information

Name: Colin Powers

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-9qxj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2551

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

In a free capitalist society companies have and do lobby aggressively for total unregulated ability to sell their wares inside and outside the country. Most products that are likely to cause danger to others or to consumers are highly regulated and rightly so like automobiles, medicines and even foods. This protection of the American and world consumer is inherent to the U. S. capitalist core. One exception is guns. Why?

Reasons abound. The point though is about the legality and morality of both selling internally and exporting to the world without logical restrictions of highly dangerous guns and war-caliber weapons to regular citizens in the name of a companys right. What about the right to protect consumers, families and communities? The government has both the economic and moral obligation to protect consumers and all citizens. The recent past legislation expired in the late 1980s that prohibited the sale of automatic and other war-calibre weapons to regular citizens inside and outside the U. S. was a bi-partisan agreement, totally in line with the U. S. Constitution. It is not a coincidence that violence in the last 20+ years has dramatically increased both in the U. S. and is currently ravaging neighboring countries. Unfortunately, this tragedy is largely caused by U. S. supplied and free-flowing arms that have no reason to be in the hands of law abiding citizens and even less accessible to dubious groups. Governments law enforcing forces are overextended and often are part of the many victims high-powered guns enable. A safety-driven and regulated gun industry is otherwise feasible.

Exporting the U. S. phoneme of mass shootings (it does not happen around the world; only with recent terrorist groups), increased violence facilitated by easy availability of guns that should only be allowed in case of war, higher risks of gun-assisted suicide and young violence are against every Americans safety. Similarly, expanding a market of death and violence by U. S. companies does not make any sense.

Restate previous limits for starters. Show what American capitalism is really all about, growing wealth and prosperity peacefully. Regulation of danger is part of this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-dmen Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2552

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judith Weeks

General Comment

I strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. It would remove the State Department's ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally; It would remove licensing requirements for brokers; and it would stop the program that inspects pre-license guns and issues reports. Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and contribute to organized crime and terrorism.

There is NO need to switch control of the export of firearms unless it is to pay for firearms lobbyists.

This is just another ruse by the NRA to gain more control and

have less oversight into their actions. PLEASE DO NOT APPROVE THIS MOVE.

Sincerely, a concerned citizen

Judith Weeks

Morrison, CO

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-lwi0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2553

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Ruud

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-91vi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2554

Comment on DOS-2017-0046-0001

Submitter Information

Name: Megan Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-mq0n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2555

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandi Hebley

Organization: Cathedral of Hope

General Comment

I am opposed to the proposal to transfer firearms export to the Department of Commerce for these reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-zwb4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2556

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-oomm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2557

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ijj8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2558

Comment on DOS-2017-0046-0001

Submitter Information

Name: Russell Okamoto

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-wwug Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2559

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rocky Salskov

General Comment

You must be kidding me! We do not need more arms throughout the world . . . if there ever were a problem they could use them against us!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-y4t3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2560

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kimber Kaushik

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9441-7c3f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2561

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ohoj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2562

Comment on DOS-2017-0046-0001

Submitter Information

Name: Frank Plucinski

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ukm0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2563

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beth McHenry

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms exports are military. The Commerce Department does not have the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-9s5r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2564

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dan Caplis

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

Do the right thing and stand up to the military industrial gun runners!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-6b6s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2565

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Kusiak-Peters

General Comment

I am extremely concerned about these proposed rule changes. Overseas weapons sales are not just simple financial transactions with little or no consequences if goods are ultimately resold or otherwise passed along to third parties. Allowing weapons to leave these borders should require extra oversight to make sure that we do not inadvertently cause problems diplomatically or allow our troops do not find themselves under attack from our own weapons. These are complex matters that require a careful weighing of many interests. The system currently in place, with the State Department providing oversight, is better able to address the myriad of concerns. The Commerce Department simply is incapable of bringing the same degree of insight to these matters as their focus is only on the monetary, rather than the practical implications for foreign policy and national security. The president and those in his administration like to talk about their concern for national security, but these proposed changes suggest otherwise. I trust actions, not empty words. These changes should not be adopted.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-mxu6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2566

Comment on DOS-2017-0046-0001

Submitter Information

Name: Monica Zikpi

General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-spf4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2567

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Hunter

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-xomf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2568

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elton McQuery

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I used the suggested wording for this comment because I am lazy, and BECAUSE I AGREE!! TOO MANY DAMNED GUNS EVERYWHERE.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-xv90 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2569

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tamera Boyd

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-ii01 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2570

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-6xsk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2571

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-m5tn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2572

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Habafy

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-xgur Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2573

Comment on DOS-2017-0046-0001

Submitter Information

Name: Neta Jackson

General Comment

My name is Neta Jackson, and I live in the Chicago area. I am very concerned about having common sense gun control and oversight of the gun industry, which in no way robs our citizens of their rights under the Second Amendment.

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce

Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

Thank you!
Neta Jackson

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944l-qzya Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2574

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nora Polk

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-kg06 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2575

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katie Riley

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. This proposed rule change would put the world in jeopardy for more potential harm through proliferation of arms and escalation of warfare and it does not benefit the American people. It only provides for more profits from gun manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-ou11 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2576

Comment on DOS-2017-0046-0001

Submitter Information

Name: Judy Schultz

General Comment

I am strongly opposed to this rule change and ask that regulations of firearms remain under the jurisdiction of the State Department. The sale of firearms to other countries is a matter of national security, and it is not only inappropriate but dangerous for these sales to be regulated by the Commerce Department. The dangers this rule change pose include firearms reaching oppressive regimes, organized crime, and terrorists, as well as 3-D printing of firearms. There is no justification for this rule change - the profits of gun manufacturers and their lobbyists do not justify the increased danger to Americans and our national security that this proposed rule change poses.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-5sgm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2577

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change will eliminate Congressional oversight for important gun export deals and transfers the cost of processing licenses from gun makers to taxpayers. It also removes statutory license requirements for brokers which could increase the risk of trafficking.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-o9mb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2578

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Woods

General Comment

I am deeply concerned by the proposal to move firearms from ITAR to EAR.

I work in the space industry, where we must be exceptionally careful in our handling not only of materials but of knowledge concerning anything that could be used in a weapons system. We are taught that a rocket, even one designed for peaceful purposes, is to be treated as a potential missile.

If ITAR regulates potential weapons, it ought to regulate actual weapons. If it doesn't, perhaps we should be looking at sharing more of our space technologies (which aren't weapons) with the rest of the world.

Moreover, the State Department not Commerce ought to have the final say on where weapons are exported and by whom, as weapon export has an obvious effect on our ability to participate in diplomacy.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-5lbe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2579

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Clarke

General Comment

I am opposed to the proposed rule change being sought by the State Department. This is a dangerous move by the State Department which will create more gun violence for other countries involved in the sale of US made firearms and munitions. Semi automatic assault rifles should not be reclassified by the Dept. of State as "non-military" type arms. Members of the US military, as well as groups engaged in armed conflict around the world. The proposal to essentially transfer the cost of processing licensing fees from gun manufacturers to taxpayers is unacceptable. Taxpayers should not have to bear the financial cost of the transactions which companies that sell guns engage in. The removal of statutory license requirements for brokers increases risk of trafficking of these firearms. Businesses in the United States should be able to sell guns to foreign governments, but under the assurance that the weapons sold will not fall risk to trafficking. This proposal enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. I am firmly opposed to removing this current prohibition on the 3D printing of firearms. We do not need to add even more enforcement responsibilities to the Dept. of Commerce when it currently has a hard time regulating current export controls. This provision transfers gun export licensing from an agency with a mission of promoting stability, conflict reduction, and human rights, to an agency with mission to promote trade. I, as a private citizen and a taxpayer am against all potential changes which the Department of State has proposed with regards to the exporting of firearms and munitions.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-ceo9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2580

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Sprague

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. That is unacceptable.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-jfhh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2581

Comment on DOS-2017-0046-0001

Submitter Information

Name: Melissa Madenski

General Comment

Dear DOS,

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. I am weary of being taxed for things like a processing license, or eliminating Congressional oversight, not to mention 3D printing of firearms. The rule change will profit the American gun industry while not a penny will be aimed toward anything that might assist the victims of gun violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-zkye Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2582

Comment on DOS-2017-0046-0001

Submitter Information

Name: Polly McGraw

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Isn't it bad enough that our country is awash in deadly weapons used indiscriminately?! Why inflict this on other countries who could easily use them the same way and promote fear and bloodshed there? The arms industry has already made more than enough profits on the death of innocents!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-6q7f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2583

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kai-Mei Fu

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-9266 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2584

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sam Bryan jr

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-cfgi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2585

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rebecca Yalcin

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944m-tv8i
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2586

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jen Anonymous

General Comment

I opposed this proposed rule for the following reasons:

- >Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- >Eliminates Congressional oversight for important gun export deals.
- >Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- >Removes statutory license requirements for brokers, increasing risk of trafficking.
- >Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- >Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- >The Commerce Department does not have the resources to enforce export controls, even now.
- >Reduces transparency and reporting on gun exports.
- >Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

I urge you to oppose this legislation.

Thank you!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-yqc8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2587

Comment on DOS-2017-0046-0001

Submitter Information

Name: John DeJarnatt

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-fril Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2588

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Gitlin

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944m-8ef7
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2589

Comment on DOS-2017-0046-0001

Submitter Information

Name: Helen Anonymous

General Comment

I totally disagree with moving this to the Commerce Dept! We cant control the massive amount of guns and killings here and to make it easier to export puts other people and countries at risk. Its shameful to want to profit more by causing deaths! What has this administration become?? Ruthless, heartless, immoral, NOTHING like the Republican Party I once knew! Below are additional reasons why this shouldnt happen.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-2ioj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2590

Comment on DOS-2017-0046-0001

Submitter Information

Name: Earl & Patricia Williams

General Comment

We must stop the proliferation of guns, here and abroad!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-ekr2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2591

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debbie Blair

General Comment

The proposed changes to the International Traffic in Arms Regulations are a threat to our national security. They would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am strongly opposed to these proposed changes which will provide a heightened threat to our national security and endanger the safety of American citizens.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-n4u2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2592

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Warden

General Comment

I oppose the proposed rule primarily because it eliminates congressional oversight, transparency and reporting of gun export transactions. Further the proposal would enable unchecked gun production in the U.S. and uncontrolled exports abroad by removing the restriction on 3D printing of firearms.

Further, there is no valid or rational reason for the proposed rule's treatment of semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Statutory license requirements for brokers, an important check on trafficking of the regulated categories of weapons, would be eliminated by the proposed rule with no alternative means of such control to replace the present licensing system.

The proposed rule, if enacted, would serve only the commercial interests of weapons manufacturers, not the interests American gun owners, the general public in the U.S. or those in other countries and regions experiencing or at risk of civil wars, criminal gang violence and intimidation by unpoliced civilian actors.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-u3xp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2593

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Scherer

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-mq7e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2594

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Minor

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. We need more stringent oversight, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-14fq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2595

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cara Harrison

General Comment

I am writing in opposition to the proposal for the U.S. to become a major international weapons dealer.

The proposed rule changes are wrong and dangerous for many reasons including:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

- Eliminates Congressional oversight for important gun export deals.

- Transfers the cost of processing licenses from gun manufacturers to taxpayers.

- Removes statutory license requirements for brokers, increasing risk of trafficking.

- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

- T--he Commerce Department does not have the resources to enforce export controls, even now.

Please do not go forward with this proposed change in rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944m-mlvb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2596

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sara Katz

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-b99u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2597

Comment on DOS-2017-0046-0001

Submitter Information

Name: Glenda Golter

General Comment

: I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-qdp0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2598

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Swanson

General Comment

I adamantly oppose the rule change that would switch the regulation of the export of firearms from the State Department to the Commerce Department. This change could result in reducing transparency and in firearms ending up in the hands of terrorists.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-9qnr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2599

Comment on DOS-2017-0046-0001

Submitter Information

Name: Babs Sullivan

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We do not need to be adding US made guns to the terror in other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-hnce Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2600

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to de

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-k7av Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2601

Comment on DOS-2017-0046-0001

Submitter Information

Name: Norma Neilson

General Comment

I feel that is very important to have strict regulations on the selling of guns of any kind. Our children & innocent people are killed every day and something needs to be done. It will help us to have safer communities and safe place for all of the school children and at events that families and individuals attend. Please help to keep all Americans safe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-4gzd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2602

Comment on DOS-2017-0046-0001

Submitter Information

Name: Juli Kring

General Comment

I wish to comment on the proposal making it easier to export U.S. guns and ammunition globally.

As a parent and a grandparent, this is an issue I feel very strongly about.

I have read that this proposal classifies semi-automatic assault rifles as non-military when they are used by our army. They are also used by opposing forces in armed conflicts, and are prohibited for civilian possession in many countries.

It would remove Congressional oversight for important gun export deals.

Taxpayers would have to pay processing licenses instead of gun manufacturers.

It removes statutory license requirements for brokers, increasing risk of trafficking.

I understand that the Commerce Department does not even have the resources to enforce export controls, as it is.

It reduces transparency and reporting on gun exports.

There are many other reasons that I know the above proposal is a very bad idea that will cost untold lives.

Please reconsider this ill timed and very unwise proposal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-v8pp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2603

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cindy Wilson

General Comment

THIS IS VERY DANGEROUS!!! BESIDES HAVING TAX PAYERS PAY FOR TAXES INSTEAD OF GUN MANUFACTURERS. SELLING GUNS NEED MORE REGULATION, NOT LESS. THIS WOULD PUT GUNS EASILY INTO THE HANDS OF TERRORISTS.
NO. NO. NO.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-hqtd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2604

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ed Perry

General Comment

I am totally opposed to the proposed rule for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-g5c5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2605

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Suter

General Comment

It's time to put a check on the American gun industry. It's bad enough that they take no responsibility for all the fatalities caused by guns in this country, and it should not be easy for them to export death across the world.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-gptj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2606

Comment on DOS-2017-0046-0001

Submitter Information

Name: Becky Marshall

General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-1do7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2607

Comment on DOS-2017-0046-0001

Submitter Information

Name: Herbert Rothschild

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-ns9u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2608

Comment on DOS-2017-0046-0001

Submitter Information

Name: carolyn massey

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-qs3s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2609

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ericka Thessen

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-6nbc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2610

Comment on DOS-2017-0046-0001

Submitter Information

Name: Casey Fast

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Please, members of the US Government, do something to stop the proliferation of weapons both here in the USA and abroad.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944n-erp5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2611

Comment on DOS-2017-0046-0001

Submitter Information

Name: Natalie Van Leekwijck

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-mnkw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2612

Comment on DOS-2017-0046-0001

Submitter Information

Name: p bryer

General Comment

I agree with the following publicly available statement of opposition to the dangerously ill-advised rule change proposal.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-brif Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2613

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Blek

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-u6o4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2614

Comment on DOS-2017-0046-0001

Submitter Information

Name: malcolm simpson

General Comment

I strongly oppose the proposal to transfer firearms regulation to the commerce dept. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-6672 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2615

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Lee

General Comment

The last thing the U.S. needs is to make it easier for businesses to supply powerful assault weapons to the world's most unstable munitions buyers. Do not enact this legislation because it:

- *Treats semi-automatic assault rifles - developed for wartime use - as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

- *Eliminates Congressional oversight for important gun export deals.

- *Transfers the cost of processing licenses from gun manufacturers to taxpayers.

- *Removes statutory license requirements for brokers, increasing risk of trafficking.

- *Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

- *Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. This exemption for a new manufacturing technology cannot be applied to weapons production, if we are to consider ourselves as Americans responsible world diplomats.

- *Reduces transparency and reporting on gun exports.

- *Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Do not re-direct us on a path to a more violent world, particularly not with taxpayer dollars.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-8apm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2616

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-8gsd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2617

Comment on DOS-2017-0046-0001

Submitter Information

Name: L Cassidy

General Comment

In a moment of history when a majority of Americans are in favor of stronger gun law, this?

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. When the first murder using a 3D printed weapon that you facilitated through this rule happens, I hope that you notice, and remember that you could have prevented it. Do better for the people. The taxpayers, the parents, the students, the teachers, the international community, need the US government to do better for humans, not corporations and lobbyists. Step up and lead.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-el2z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2618

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Pearson

General Comment

I oppose this rule. There are already too many guns and too few protections for humans, especially children, who want to live quietly and in peace. This rule change will result in more harm, more refugees, and more instability around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-opyp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2619

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

: I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-wjdo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2620

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gail Streicker

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This is a just plain terrible idea that puts profits over the lives of people. Please do not approve!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944o-fztq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2621

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joan Stoneking

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-2ded Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2622

Comment on DOS-2017-0046-0001

Submitter Information

Name: Timothy Woolsey

General Comment

Is this really a good way to export American values around the world?
Isn't this just yet another result of powerful lobbying activities by gun manufacturers to increase sales?
What possible good can come of this other than increasing the profits of the gun industry?
Wouldn't it be better to promote American values in the form of diplomacy, educational exchanges, artistic exchanges?
We should be making it more difficult to obtain these weapons rather than easier if we are truly interested in a more peaceful world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-fdvb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2623

Comment on DOS-2017-0046-0001

Submitter Information

Name: Claudia Reyes

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-rf3l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2624

Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Yokers

General Comment

I oppose re-classifying these regulated weapons from where they are now: "military", under export regulation by the State Department, to the regulation by the Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. That means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

As "military", these regulated weapons are under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-i302 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2625

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cheryl Braginsky

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. We are already fueling too much violence around the world with our arms sales, including weapon sales that support the violence in our neighbor, Mexico.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-bp2c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2626

Comment on DOS-2017-0046-0001

Submitter Information

Name: NRA ILA

General Comment

See attached file(s)

Attachments

Export-Reform_Cats. I-III_Final

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030



July 6, 2018

Mr. Robert Monjay
Office of Defense Trade Controls
United States Department of State
2401 E Street, Northwest
Washington, District of Columbia 20226

Via Online Submission: <https://www.regulations.gov/docket?D=DOS-2017-0046>

**Re: Docket No. DOS-2017-0046; RIN 1400-AE30; International Traffic in Arms
Regulations: U.S. Munitions List Categories I, II, and III**

Dear Mr. Monjay:

I am writing on behalf of the National Rifle Association (NRA) to provide the association's comments on the above proposed rule (the proposal). With some six million dues-paying members, the NRA is America's premier defender of the civil right protected by the Second Amendment. Our members include individuals and businesses that would be directly affected by the changes in the proposal, including gunsmiths, firearm instructors, journalists and writers covering firearm technology and development, hunters, competitive shooters, and manufacturers.

The NRA is very pleased to see that the project of Export Reform has finally circled back to the place where it began, with proposed amendments to Categories I, II, and III of the U.S. Munitions List (USML). These were among the first of the changes planned for the large-scale undertaking to update export controls on dual-use items, and rightly so. The Second Amendment protects an individual right to possess and carry firearms in case of confrontation, extending to

arms in common use among the population for lawful purposes.¹ America boasts hundreds of millions of privately-owned firearms² and a robust “gun culture” that has produced countless books, magazine articles, videos, websites, online forums, etc., that exhaustively detail firearm technology and use. It is difficult to imagine any information about the design, development, production, manufacturing, and use of firearms that is not already within the public domain. This same information is commonly available overseas, as are the types of firearms and ammunition the proposal would move off the USML and onto the Commerce Control List (CCL). Meanwhile, the might and sophistication of the U.S. military – as well as America’s armed populace – ensure that no foreign enemy wielding the type of arms at issue in these proposed amendments to the USML could pose a serious threat to this nation’s security.

Of course, movement of commonly-available firearms and ammunition to the CCL would not leave their export unregulated. America already has one of the most well-established and closely-administered systems of regulation for commercial production and distribution of firearms and ammunition in the world, and the proposal would not change that. It is clear from the companion rulemaking published by the Commerce Department that items moving off the USML would remain closely controlled, with the necessity of export licenses remaining the norm. Foreign individuals’ access to firearms and ammunition would also remain regulated under the federal Gun Control Act and the National Firearms Act. Furthermore, the Commerce Department has long regulated exports of various shotguns, as well as their parts, components, accessories, and ammunition. Thus, it has existing knowledge of and relationships with many of the entities the proposal will affect. Those entities, in turn, will also have some familiarity with the Department’s regulatory environment and procedures.

The NRA believes that, on the whole, the proposal correctly balances the imperatives of national and global security, allocation of oversight resources, and promotion of American industry, innovation, and competitiveness. We do, however, think it could be improved in several particulars. We also believe that the timing for the implementation of the rule deserves careful consideration.

Specifically, our concerns involve the following:

- * **The retention of firearm sound suppressors on the USML is contrary to the guiding principles of Export Reform and does not serve its purposes.** Suppressors should also be moved to the CCL, unless they are specifically designed for use only with firearms that remain on the USML.

¹ *District of Columbia v. Heller*, 554 U.S. 570, 592, 624-25 (2008). *See also McDonald v. Chicago*, 561 U.S. 742 (2010) (Second Amendment right to keep and bear arms is fully incorporated against state and local action by virtue of the Fourteenth Amendment).

² The Small Arms Survey estimates that as of the end of 2017, there were 121 firearms for every 100 residents in the U.S., for a total of some 393.2 million guns. The program director for the Small Arms Survey Institute notes, however, that “there is no direct correlation at the global level between firearm ownership and violence.” *See* Edith M. Lederer, “Global survey shows more than 1 billion small arms in world, mostly owned by civilians and mostly in the U.S.,” *ChicagoTribune.com*, June 18, 2018, <http://www.chicagotribune.com/news/nationworld/ct-survey-small-arms-world-civilians-20180618-story.html>.

For these reasons, and as detailed below, the NRA supports the proposal but advocates for minor revisions before its publication as a final rule.

I. Firearm Sound Suppressors, As Such, Do Not Meet the Prerequisites for Control on the USML Articulated by the Proposal and Therefore Should be Controlled Under the CCL.

As noted in its supplementary information, the proposal is part of a longstanding effort to “revise the U.S. Munitions List so that its scope is limited to those defense articles that provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use.” Whether or not sound suppressors for firearms are characterized as “weapons,” there is no plausible argument that the devices meet these standards.

A firearm sound suppressor is basically a metal cylinder surrounding internal baffles that slow and cool escaping gas to decrease the volume of the firearm's muzzle report. The devices reduce, but do not eliminate, the sound of gunshots.³ Suppressors have been commercially available since the first decade of the 1900s.⁴ The technology necessary to produce them is simple and well-understood throughout the developed world. Detailed design, development, production, and manufacturing information for firearm sound suppressors is pervasively available in the public domain, including on the Internet.⁵ Similar devices are used to moderate the sound of various other consumer products powered by internal combustion, including automobiles, chainsaws, and lawnmowers.

³ Glenn Kessler, "Are firearms with a silencer 'quiet'?" WashingtonPost.com, March 20, 2017, https://www.washingtonpost.com/news/fact-checker/wp/2017/03/20/are-firearms-with-a-silencer-quiet/?noredirect=on&utm_term=.301e14951dd4.

⁴ Stephen Halbrook, “Firearm Sound Moderators: Issues of Criminalization and the Second Amendment,” 46 *Cumb. L. Rev.* 33, 42 (2015).

⁵ A quick web browser search will reveal numerous webpages and videos offering detailed instructions on constructing suppressors of various levels of sophistication, from products produced with lathes and other machine tools to improvised models made from such materials as PVC, flashlight tubes, oil filters, and solvent traps. There's even a detailed suppressor schematic on the ATF's own website: <https://www.atf.gov/file/silencer-cut-away>.

Suppressors do not provide the United States with any critical military or intelligence advantage. They are not unique to the United States and are in fact the rare type of firearm-related product that historically has been regulated more closely in this country than in a number of other countries with otherwise relatively strict gun control laws. In some foreign countries, there are no special requirements to acquire or possess firearm suppressors; in certain others, they are presumptively available to those with a firearm license.⁶ Firearm suppressors are already in use by military forces, law enforcement agencies, and civilian firearm owners across the world. Simply put, any country sophisticated enough to produce firearms is sophisticated enough to produce firearm sound suppressors.

Firearm sound suppressors, by themselves, are harmless and cannot accurately be classified as “weapons.” They are only useful when actually attached to a firearm. Even then, they do not make the firearm any more lethal. Their primary advantage is to protect the hearing of the firearm’s user and to decrease the sound signature of firearms so their use is less noticeable and has fewer collateral effects on those in vicinity of the firearm’s discharge.

And even assuming, for the sake of argument, suppressors could be characterized as “weapons,” they are not “inherently military.” Suppressors are regulated and taxed under U.S. law,⁷ but they are readily available to those who are legally eligible to own firearms. They are lawful for private possession in 42 states and may be lawfully used for hunting in 40 states.⁸ Suppressors adorn the firearms of plinkers, hunters, competitors, and law enforcement officers. According to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), there were 1,297,670 suppressors registered under the National Firearms Act as of February 3, 2017, with nearly 400,000 such registrations occurring in the 12 months preceding that date alone.⁹ As previously mentioned, suppressors are also commonly used by law enforcement agencies and private firearm owners in other countries as well.

In its current form, the proposal does not differentiate between suppressors for use on firearms that would be regulated under the USML and those that would not. This could mean that firearms that would otherwise be regulated under the CCL will remain on the USML because they have integrated suppressors. It could also mean that firearm instructors would have to refrain from allowing suppressors to be used in their classes for fear of providing unauthorized “defense services.” This is contrary to the spirit and intent of Export Reform and does nothing to further U.S. or international security interests.

Given that there is no special military or national security significance to firearm sound suppressors, there is no convincing argument for retaining them on the USML. Like flash suppressors, they should be generally subject to the CCL. If they are going to be retained on the USML at all, it should only be to the extent that they are “specially designed” for the firearms

⁶ 46 Cumb. L. Rev. at 72-4.

⁷ See National Firearms Act, 26 U.S.C. §§ 5801-5872; Gun Control Act, 18 U.S.C. §§ 921-931.

⁸ American Suppressor Association, Education Webpage, <https://americansuppressorassociation.com/education/> (last visited July 6, 2018).

⁹ Stephen Gutowski, “ATF: 1.3 Million Silencers in U.S. Rarely Used In Crimes,” FreeBeacon.com, Feb. 17, 2017, <http://freebeacon.com/issues/atf-despite-nearly-1-3-million-silencers-united-states-rarely-used-crimes/>.

that would also continue to be so controlled. Because that distinction would be difficult to administer as a practical matter, however, the best option is simply to control the general category of firearm sound suppressors under the CCL.

II. The Proposal's Treatment of Magazines is Arbitrary and Capricious.

The proposal treats magazines as “high capacity” and therefore subject to the USML if they have a capacity of greater than 50 rounds, “regardless of jurisdiction of the firearm.” It offers no explanation for this threshold. Whatever the thinking behind it may be, a 51-round magazine provides no greater critical military or intelligence advantage than a magazine of lesser capacity, nor is it any more inherently for military end use.

Magazines, whatever their capacity, are among the most simple and utilitarian of firearm-related items. In typical form, they consist of a metal box or tube with a floor plate that contains a spring with a follower at the top. A firearm that can accept a detachable magazine can accept a magazine of virtually any size. All that is necessary to create a magazine of greater capacity is a longer box and spring. Drum magazines typically utilize a cylindrical chamber and a wound spring or ratcheting mechanism to allow for greater capacity in a more compact unit, but neither configuration uses sophisticated or closely-held technology. Like firearm sound suppressors, technical data for magazines with capacities above and below 51 rounds is available in the public domain, including online, and has been since at least the early 20th Century.¹⁰

United States law does not limit the capacity of magazines for any sort of firearm available to private citizens (a handful of states, however, do impose magazine capacity limits, typically of 10 rounds). Magazines with capacities in excess of 50 rounds are readily available on the commercial market. They are used by practical shooting competitors, as well as by many gun owners who appreciate the versatility and convenience they provide. Even BB guns for the youth market that use springs or compressed air often have reservoirs that hold hundreds of rounds. While these non-powder guns obviously are not and would not be defense articles under the proposal, their capacity demonstrates the fact that marksmen of all types appreciate the ability to operate their guns without frequent reloading.

Demonstrating the arbitrary nature of controlling magazines based on their capacity is the fact that they can easily be clipped, taped, or otherwise attached to one another, with reloads accomplished in mere moments.

As with sound suppressors, it makes no sense that a given curriculum of firearm instruction that would otherwise be uncontrolled under the proposal could potentially be re-characterized as a “defense service” if it happened to involve a “large capacity” magazine.

¹⁰ See, e.g., European Patent Office Patent No. 8172, “A New or Improved Cartridge Magazine for Small Arms and Machine Guns,” Accepted March 6, 1919 (providing detailed specifications for a drum-type magazine), available at <https://worldwide.espacenet.com/publicationDetails/originalDocument?CC=GB&NR=191508172A&KC=A&FT=D&ND=3&date=19190306&DB=EPODOC&locale=> (last visited July 6, 2018).

For these reasons, we recommend that firearm magazines be controlled under the CCL. If they are controlled under the USML at all, it should only be to the extent they “specially designed” solely for firearms that remain on the USML.

III. The Final Rule Should Take Effect Immediately to the Extent Requirements Are Eliminated and Phase in Other Changes to Allow Regulated Entities Time to Adapt.

When the final rule governing Categories I, II, and III of the USML is published, certain changes should take effect immediately, while others should be phased in to allow regulated entities time to adapt.

Changes that merely eliminate requirements altogether should take effect immediately. For example, there is no justification for continuing to make “manufacturers” of articles that would be moved off the USML register with the Department of State.

On the other hand, where control of an item changes from the USML to the CCL, necessitating new procedures by the regulated entity, implementation of the final rule’s effective date should be delayed to allow for new compliance systems to be established.

Licenses granted under the ITAR should also be grandfathered for all outstanding transactions.

The NRA does not have any specific recommendations for a timeline of implementation for enforcing new requirements and procedures. We will defer to the entities whose day-to-day operations will be directly affected by the changes in the final rule.

Conclusion

The NRA is very pleased to see Export Reform finally turn its attention to Categories I, II, and III of the USML. The proposal charts a positive course that will contribute to national security, enhance the competitiveness of U.S. businesses, and benefit ordinary gun owners by mitigating the potential for the ITAR to burden innocent conduct that does not implicate national security. We hope you will take the suggestions offered herein seriously to further promote the worthy goals of this effort, and we appreciate the opportunity to provide input.

We have also included our submission on the Bureau of Industry and Security’s companion rulemaking and incorporate those comments herein by this reference.

Sincerely,



Christopher Zealand
Senior Research Attorney
NRA-ILA

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030



July 6, 2018

Regulatory Policy Division
Bureau of Industry and Security
United States Department of Commerce
14th Street and Pennsylvania Avenue, Northwest
Washington, District of Columbia 20230

Via Online Submission: <https://www.regulations.gov/document?D=BIS-2017-0004-0001>

**Re: Docket No. BIS-2017-0004; RIN 0694-AF47; Control of Firearms, Guns,
Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)**

Greetings:

I am writing on behalf of the National Rifle Association (NRA) to provide the association's comments on the above proposed rule (the proposal). With some six million dues-paying members, the NRA is America's premier defender of the civil right protected by the Second Amendment. Our members include individuals and businesses that would be directly affected by the changes in the proposal, including gunsmiths, firearm instructors, journalists and writers covering firearm technology and development, hunters, competitive shooters, and manufacturers.

The NRA is very pleased to see that the project of Export Reform has finally circled back to the place where it began, with proposed amendments to Categories I, II, and III of the U.S. Munitions List (USML). These were among the first of the changes planned for the large-scale undertaking to update export controls on dual-use items, and rightly so. The Second Amendment protects an individual right to possess and carry firearms in case of confrontation, extending to

arms in common use among the population for lawful purposes.¹ America boasts hundreds of millions of privately-owned firearms² and a robust “gun culture” that has produced countless books, magazine articles, videos, websites, online forums, etc., that exhaustively detail firearm technology and use. It is difficult to imagine any information about the design, development, production, manufacturing, and use of firearms that is not already within the public domain. This same information is commonly available overseas, as are the types of firearms and ammunition the proposal would regulate under the Commerce Control List (CCL). Meanwhile, the might and sophistication of the U.S. military – as well as America’s armed populace – ensure that no foreign enemy wielding the types of arms at issue in these proposed regulations could pose a serious threat to this nation’s security.

Of course, movement of commonly-available firearms and ammunition to the CCL would not leave their export unregulated. America already has one of the most well-established and closely-administered systems of regulation for commercial production and distribution of firearms and ammunition in the world, and the proposal would not change that. It is clear from the proposal that items moving off the USML would remain closely controlled, with the necessity of export licenses remaining the norm. Foreign individuals’ access to firearms and ammunition would also remain regulated under the federal Gun Control Act and the National Firearms Act. Furthermore, the Commerce Department has long regulated exports of various shotguns, as well as their parts, components, accessories, and ammunition. Thus, it has existing knowledge of and relationships with many of the entities the proposal will affect. Those entities, in turn, will also have some familiarity with the Department’s regulatory environment and procedures.

The NRA believes that, on the whole, the proposal correctly balances the imperatives of national and global security, allocation of oversight resources, and promotion of American industry, innovation, and competitiveness. We do, however, think that it could be improved in several particulars. We also believe that the timing for the implementation of the rule deserves careful consideration.

Specifically, our concerns involve the following:

- **§ 740.9 Temporary imports, exports, reexports, and transfers (in-country) (TMP) and § 758. 10 Entry clearance requirements for temporary imports – The use of the Automated Export System (AES) is impractical and inappropriate for private travelers exporting a personal firearm they temporarily imported into the U.S. for**

¹ *District of Columbia v. Heller*, 554 U.S. 570, 592, 624-25 (2008). *See also McDonald v. Chicago*, 561 U.S. 742 (2010) (Second Amendment right to keep and bear arms is fully incorporated against state and local action by virtue of the Fourteenth Amendment).

² The Small Arms Survey estimates that as of the end of 2017, there were 121 firearms for every 100 residents in the U.S., for a total of some 393.2 million guns. The program director for the Small Arms Survey Institute notes, however, that “there is no direct correlation at the global level between firearm ownership and violence.” *See* Edith M. Lederer, “Global survey shows more than 1 billion small arms in world, mostly owned by civilians and mostly in the U.S.,” *ChicagoTribune.com*, June 18, 2018, <http://www.chicagotribune.com/news/nationworld/ct-survey-small-arms-world-civilians-20180618-story.html>.

lawful purposes. The current system, which relies upon the ATF Form 6NIA, should be maintained without modification for such persons.

- § 740.14 Baggage (BAG) and § 758.1 The Electronic Export Enforcement (EEI) filing to the Automated Export System (AES) – The use of the AES is impractical and inappropriate for private travelers temporarily exporting a personal firearm for lawful purposes. The current system, which relies upon the CBP Form 4457, should be maintained without modification for such persons until such time as U.S. Customs and Border Protection engages in a public rulemaking process to resolve the current problems.
- § 758.1 The Electronic Export Enforcement (EEI) filing to the Automated Export System (AES) and § 762.2 Records to be retained – Expanding the data elements necessary for AES filings would exacerbate the problems for private travelers temporarily exporting a personal firearm and violate the spirit of Congressional prohibitions against federal firearm registries. Private travelers temporarily exporting personal firearms should continue to be able to use the CPB Form 4457 without the firearm's information being captured by a federal database.
- Where manufacturers and exporters need to implement new compliance procedures for items moving from the USML to the CCL, the final rule should have a delayed implementation date; where requirements that once pertained under the International Traffic in Arms Regulations (ITAR) have no analogues under the Export Administration Regulations (EAR), the changes should take effect immediately.

For these reasons, and as detailed below, the NRA supports the proposal but advocates for revisions before its publication as a final rule.

I. The AES System is Impractical and Inappropriate for Use by Private Travelers.

A. The AES requirement was introduced without sufficient or accurate notice to the public.

The International Traffic in Arms Regulations historically had included an exemption under 22 CFR §123.17(c) that allowed U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges therefor. This exemption was geared toward hunters, sportsmen, competitors, and others who travel overseas with firearms to be used for sporting and other lawful purposes.

In 2011, DDTC published a Federal Register notice of proposed rulemaking entitled International Traffic in Arms Regulations: Exemption for Temporary Export of Chemical Agent Protective Gear.³ The supplementary information to that rulemaking focused on amendments to 22 CFR §123.17 pertaining to “the temporary export of chemical agent protective gear for

³ 76 Fed. Reg. 16353 (March 23, 2011).

exclusive personal use” It also mentioned that “an exemption for firearms and ammunition is clarified by removing certain extraneous language that does not change the meaning of the exemption.”⁴

In fact, the proposed change to the firearms and ammunition exemption was a material and substantial change to the status quo. It would require for the first time that “the individual must ... present the Internal Transaction Number (ITN) from submission of the Electronic Export Information in the Automated Export System per § 123.22(b)” to use the exemption.⁵

But because the notice only printed the amendments to 22 CFR §123.17 and omitted the existing text of that section, it was not clear from the face of that notice what the context of this new requirement was. The notice’s inaccurate portrayal of the change as a mere “clarification” further contributed to obscuring the significance of this new language. Thus, the new requirement for temporary firearms and ammunition exports went largely unnoticed by relevant stakeholders.

The final rule was published on May 2, 2012.⁶ Its supplementary information included a similarly inaccurate description of the firearm exemption amendment. “Section (c)(3) is revised to remove what is in practice extraneous language,” it stated.⁷ “Subject to the requirements of (c)(1)–(3), the exemption applies to all eligible individuals (with the noted exceptions). Thus, while the text is revised, the meaning of (c)(3) is not changed.”⁸

Unlike the notice for the proposed rule, however, the notice of the final rule included the full text of subsection (c), which made clear the AES filing requirement pertained to those claiming the licensing exemption for temporary firearm and ammunition exports. Of course, it was by then too late for stakeholders to object to these changes, as the rule had been finalized.

For three years, the changes to 22 CFR §123.17 as they pertained to temporary firearm and ammunition exports appeared to be ignored and unenforced by the federal government. Then, in 2015, U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP) suddenly changed their websites to indicate the AES filing requirements would be enforced against travelers temporarily exporting firearms and ammunition, with penalties that could include seizure of improperly declared items and criminal prosecution.⁹

⁴ *Id.*

⁵ *Id.* at 16354.

⁶ Amendment to the International Traffic in Arms Regulations: Exemption for Temporary Export of Chemical Agent Protective Gear, 77 Fed. Reg. 25865-01 (May 2, 2012).

⁷ *Id.*

⁸ *Id.*

⁹ See NRA-ILA, “Rule Change May Devastate International Travel for Hunters and Shooters,” <https://www.nra-ila.org/articles/20150320/rule-change-may-devastate-international-travel-for-hunters-and-shooters> (March 20, 2015).

B. The AES was not designed for use by private persons for non-business purposes.

The AES was designed around the needs of commercial exporters and government officials, not private travelers. As CBP's "Introduction" to the AES states:

During AES development, a Trade Resource Group convened regularly. To ensure that all voices were heard, the group was comprised of large and small exporters, carriers, freight forwarders, port authorities, and non-vessel operating common carriers (NVOCC). At the trade's request, separate coalitions for exporters and software vendors were formed.^[10]

It continues, "Whatever aspect of the export community you represent - exporter, carrier, freight forwarder, port authority, service center, non-vessel operating common carrier, consolidator - AES has advantages for you."¹¹ Nowhere does this summary recognize that private individuals would also have to navigate a system designed by and for industry compliance specialists.

Individuals attempting to use the AES will need to have compatible hardware and software systems or to enlist the services of an authorized agent. Those who do not wish to purchase or write their own software, or hire someone to complete the filing process for them, have the option of using AESDirect, an online version administered by the U.S. Census Bureau.

That agency, in turn, has a webpage with various resources to acquaint users with the intricacies of the system.¹² Browsers can start, for example, with the 39-page *AESDirect User Guide*¹³ or with any of the one-hour-plus webinars that cover various aspects of the system.

Navigating the filing process requires individuals to create an account and then fill in data fields with various codes that are neither intuitive nor easily reconcilable with the context of an individual traveling with his or her own private property. For example, the system requires the parties to an export to be identified, with required fields that include the U.S. Principal Party in Interest, which must be identified by "Company Name" and an acceptable ID type. Likewise, the Ultimate Consignee also must be specified, again with reference to "Company Name" and an authorized form of identification.

Nowhere does the User Guide or the screens of the system itself explain how these categories are supposed to translate for private individuals declaring temporary exports of their

¹⁰ U.S. Customs and Border Protection, "AES: An Introduction," <https://www.cbp.gov/trade/aes/introduction> (last visited July 6, 2018).

¹¹ *Id.*

¹² U.S. Census Bureau, "ACE AESDirect – Resources," https://www.census.gov/foreign-trade/aes/aesdirect/transit/outoace.html?eml=gd&utm_medium=email&utm_source=govdelivery (last visited July 6, 2018).

¹³ Available at <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf> (last visited July 6, 2018).

own property. Such persons are not just an afterthought in the system's design. Rather, it appears that the design has not thought of them at all.

The acceptable forms of identification, for example, are an Employer Identification Number (EIN), a Dun and Bradstreet Number, or a foreign passport number (if the foreign entity is in the U.S. at the time the goods are purchased or obtained for export). U.S. individuals making temporary exports cannot use their own passport numbers, nor can they use their Social Security numbers.¹⁴

Using AESDirect, moreover, requires an individual to apply for an account with the Secure Data Portal of the Automated Commercial Environment. The application for an ACE Exporter Account¹⁵ requires users to list "Corporate Information," including an EIN and Company Name.

The Internal Revenue Service (IRS) is responsible for issuing EINs. The IRS website that explains the process for applying online clearly states: "Employer Identification Numbers are issued for the purpose of tax administration and are not intended for participation in any other activities."¹⁶ The online application requires the applicant to identify the "legal structure" associated with the EIN. None of the available options corresponds with a private individual who simply wishes to make an AES filing. The applicant then must specify why he or she is requesting an EIN, with the limited menu choices again offering no option for the private AES filer. Finally, the applicant must certify under penalties of perjury that he or she has "examined this application, and to the best of my knowledge and belief, it is true, correct, and complete."¹⁷

Private individuals using the online application form, in other words, must make a false certification to the IRS about their business need for an EIN as a prerequisite to complying with the legally-mandated AES filing requirement. These individuals are also potentially creating an expectation with the IRS that they are creating a business that should have associated tax filings.

C. The relevant agencies have been aware of the problems private individuals have using the AES, and there has been no apparent progress in resolving them.

In 2015, representatives of the NRA – as well as representatives of hunting and firearm industry associations – met with officials from CBP, the Census Bureau, the Department of

¹⁴ See U.S. Customs and Border Protection, "Change in Automated Export System (AES) exporter ID filing requirement," https://help.cbp.gov/app/answers/detail/a_id/1145/kw/EIN%20number%20needed%20for%20export (last visited July 6, 2018).

¹⁵ Available at https://ace.cbp.dhs.gov/acexpub/acexpub_Apps/ExporterAccountApplication/expForm.php (last visited July 6, 2018).

¹⁶ IRS, "Apply for an Employer Identification Number (EIN) Online," <https://www.irs.gov/businesses/small-businesses-self-employed/apply-for-an-employer-identification-number-ein-online> (last visited July 6, 2018).

¹⁷ See IRS Form SS-4, available at <https://www.irs.gov/pub/irs-pdf/ss4.pdf> (last visited July 6, 2018). Note the PDF of the SS-4 has options for "Other (specify)" not available on the IRS's online application form. It does not, however, indicate that EINs may be obtained solely for AES filing purposes.

Homeland Security (DHS), and ICE to discuss the above problems.¹⁸ These discussions emphasized the need for a simple, straightforward, and legal means for private travelers to comply with their AES filing requirements. The discussions also touched on concerns about creating a federal firearm registry via AES filings (a topic that is explored below in greater depth).

Shortly after that meeting, and after additional intervention from members of Congress, CBP announced that it would return to the status quo practice of using the paper CBP Form 4457 to track firearms for temporary export.¹⁹ In this procedure, travelers report to a CBP office during their trip or beforehand at a Port of Entry and present the firearms (and ammunition, if applicable) to be recorded on the 4457. Upon return to the U.S., the traveler will declare the property, which can be checked, if necessary, against the 4457 to ensure the same firearms that left the country have returned. The ATF has also indicated that this procedure will satisfy the re-importation of firearms under its importation jurisdiction.²⁰

We understand that this remains the procedure for temporary firearm exports by private travelers to the present day and that the AES filing requirement is not being enforced against these individuals.

Between 2015 and the present, NRA representatives have had repeated contacts with officials from CBP and the Census Bureau to inquire about any changes or updates to the above-described state of affairs. To date, we have neither seen nor heard of any evidence that the AES system has been in any way modified to alleviate the problems it presents for private travelers. Our review of the applicable websites during the preparation of these comments confirms this impression. The AES remains a complex application geared toward the needs of industry and government, not private persons traveling with their own property for non-business purposes.

D. BIS should omit the AES filing requirement for private persons temporarily exporting their own firearms and ammunition for lawful purposes and codify the Form 4457 procedure.

The NRA is pleased to see that BIS' current proposal is handling the AES issue in a much more transparent and forthright manner than the 2012 DDTC rulemaking that introduced it in the first place. The background information included with the proposal acknowledges:

BIS is aware that U.S. Customs and Border Protection (CBP) has temporarily suspended the requirement to file EEI to the AES for personally-owned firearms and ammunition that are "subject to the ITAR" being exported under 22 CFR 123.17(c), due to

¹⁸ See NRA-ILA, "You Can't Get There from Here: Obama Administration Shrugs Off Woes of International Travelers," <https://www.nra-ila.org/articles/20150417/cant-get-there-from-here-obama-administration-shrugs-off-woes-of-international-travelers> (April 17, 2015).

¹⁹ See, e.g., P.J. Reilly, "U.S. Government withdraws confusing new gun rules for traveling hunters," LancasterOnline, April 27, 2015, https://lancasteronline.com/news/local/u-s-government-withdraws-confusing-new-gun-rules-for-traveling/article_c2991fcc-ecec-11e4-8c21-3b622f277d23.html.

²⁰ See 27 C.F.R. § 478.115(a).

operational challenges related to implementation. ... Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP's existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition.

As explained above, the CBP and the other relevant agencies have not updated their processes to allow for individuals to easily file Electronic Export Information in the AES. Given that they are aware of the issues, have had more than three years to fix them, and have made no discernable progress in that direction, there is no reason to believe they will do so by the time the proposal is published as a final rule.

The NRA is unaware of any compelling security need to change the status quo. The very fact that the systems have not been updated to address the outstanding issues would seem to indicate CBP and DHS agree. Simply put, there has been no urgency to facilitate AES filings by private travelers. The Form 4457 procedure has proven to be a workable system both before and since the 2012 rule change, and it can continue to suffice for the near term.

The paper Form 4457 also serves an important function for some U.S. travelers to foreign countries that require a valid "firearm license" from visitors' home countries. Neither the U.S. government nor most U.S. states generally license the acquisition or simple possession of firearms, especially long guns. But foreign officials in these countries have historically accepted the Form 4457 as fulfilling this requirement.

It is also relevant that BIS has throughout the relevant time period always allowed for the temporary export of shotguns and shotgun shells under its jurisdiction via the baggage exemption of 15 C.F.R. § 740.14 without requiring a declaration to be filed in the AES. Indeed, that exemption currently does not specifically require the use of the Form 4457 procedure, either. Codifying the Form 4457 procedure would therefore help promote consistency and understanding across the different agencies involved in enforcing the nation's export rules and with the traveling public. The president's determination that certain additional firearms and ammunition no longer warrant control under the USML more strongly argues in favor of BIS adopting its own procedures for their temporary export than for importing procedures from the ITAR into the EAR.

CBP can also issue its own rulemaking on procedures for temporary exports by private travelers, should the state of play change with respect to the practical and technological issues of the AES. The issue could then be fully vetted in its own right. There is no reason, however, to inject this thorny issue into the larger project of Export Reform. It is not necessary nor helpful to the objectives of Export Reform, and it would perpetuate a problem one solution to which has already been identified (i.e., the paper Form 4457 procedure).

- E. Private travelers exporting a personal firearm they temporarily imported into the U.S. for lawful purposes should not be required to use AES for this purpose.

The same problems that arise from requiring U.S. persons to file declarations through the AES to take advantage of the BAG exemption apply to requiring foreign visitors traveling to the U.S. with their own firearms to use the AES to avail themselves of the TMP exception. This is not necessary under the current version of 15 C.F.R. § 740.9, and it should not be added to that section or to § 758.1.

Currently, foreign visitors traveling to the U.S. with their own firearms must apply for an import permit from the Bureau of Alcohol, Tobacco, Firearms & Explosives using ATF Form 6NIA. The individual will also have to substantiate his or her eligibility to possess a firearm in the United States as a non-U.S. person (for example, by obtaining a hunting license from a U.S. state). The travelers must then declare their firearms at the border, provide CBP officials with any required documents, and maintain the required documents during the duration of their stay. Customs officials in the country of re-importation can use the ATF Form 6NIA to confirm that the individual is returning with the same firearms that were brought to the U.S.

We are unaware of any attempt on DDTTC's part to enforce a requirement that foreign visitors (including from Canada) declare the "export" of firearms they temporary brought to the U.S. for lawful purposes through the AES when the visitor returns home. Indeed, it is difficult to understand how doing so would contribute to national security. Thanks the Second Amendment and America's unique commitment to individual liberty, the U.S. has by far the largest civilian stock of firearms in the world.²¹ Given the ready availability of firearms in the U.S. as compared to the rest of the world, there is little chance that America's interests are seriously threatened by foreign visitors bringing their own lawfully obtained guns into the country. At the very least, they are not threatened enough to impose a bureaucratic requirement for private foreign travelers that has already proven unworkable for their U.S. counterparts.

For these reasons, we urge BIS to omit from §§ 740.2 and 758.10 the AES declaration requirement as applied to private foreign travelers temporarily bringing personal firearms into the U.S. Foreign hunters and competitive shooters help contribute to the U.S. economy, and these proposed changes would discourage them from doing so. Meanwhile, reports of foreign travelers committing crimes in the U.S. with firearms they lawfully brought with them are vanishingly rare.

II. The expanded data elements necessary for AES filings exacerbate the problems for private travelers forced to use the system and violate the spirit of Congressional prohibitions against federal firearm registries.

The proposal would "expand the data elements required as part of an AES filing for [firearms transferred from the USML] to include serial numbers, make, model and caliber," including for those wishing to use the BAG and TMP exemptions. This makes the previously mentioned problems with AES filing that much worse. It also runs counter to the spirit of clearly

²¹ Lederer, *supra* note 2.

established Congressional policy against using bureaucratic record-keeping requirements to establish firearms registries.

Firearm registries have long been anathema to gun owners as a tool that can be used to target them for discrimination and for the eventual seizure of their firearms. History is rife with examples of tyrants who used civilian disarmament to further their despotic ends,²² and America's own Revolutionary War began in earnest after a British raid on Colonial arms caches. Against this backdrop, federal gun control laws have consistently maintained a policy against national registries of the sorts of common arms with which Americans typically exercise their Second Amendment rights.²³

Congress, in enacting the Gun Control Act of 1968 (GCA), specifically declined to create a federal firearm registry, despite the urging of President Lyndon B. Johnson to do so.²⁴ Both the House and the Senate voted down proposals to require registration of guns as the legislation made its way through Congress.²⁵ As Sen. James McClure later stated,

The central compromise of the Gun Control Act of 1968—the sine qua non for the entry of the Federal Government into any form of firearms regulation was this: Records concerning gun ownership would be maintained by dealers, not by the Federal Government and not by State and local governments.^[26]

Congress then amended the GCA in 1986 to prohibit any rule or regulation enacted under its auspices from using the records that federal firearm licensees must keep to establish “any system of registration of firearms, firearms owners, or firearms transactions or dispositions”²⁷

When the Brady Handgun Violence Protection Act of 1993²⁸ created the authority for the National Instant Criminal Background Check System (NICS), Congress took pains to ensure the system would not circumvent the GCA's policy against firearm registration. The Act states that if the NICS determines receipt of a firearm would not be in violation of law, it shall “destroy all records of the system with respect to the call (other than the identifying number and the date the

²² See, e.g., STEPHEN HALBROOK, GUN CONTROL IN THE THIRD REICH, DISARMING THE JEWS AND “ENEMIES OF THE STATE” (Independent Inst. 2013).

²³ The National Firearms Act, 26 U.S.C. §§ 5801-5872, requires federal registration of limited categories of arms, but to the extent it covers firearms, those guns— which include machineguns, short-barreled shotguns, short-barreled rifles, and non-sporting firearms greater than .50 caliber — are comparatively rare among the U.S. civilian firearm stock.

²⁴ See Lyndon B. Johnson, “Remarks Upon Signing the Gun Control Act of 1968,” Oct. 22, 1968, available at <http://www.presidency.ucsb.edu/ws/?pid=29197> (last visited July 6, 2018).

²⁵ 114 Cong. Rec. H22267 (daily ed. July 19, 1968); 114 Cong. Rec. S27420-421 (daily ed. Sept. 18, 1968).

²⁶ 131 Cong. Rec. S9163-64 (July 9, 1985).

²⁷ 18 U.S.C. § 926(a).

²⁸ Pub. L. No. 103-159, 107 Stat. 1536 (1993).

number was assigned) and all records of the system relating to the person or the transfer.”²⁹ Section 103(i) of the Act contains additional prohibitions against the use of the system to create a federal firearms registry:

No department, agency, officer, or employee of the United States may—

(1) require that any record or portion thereof generated by the system established under this section may be recorded at or transferred to a facility owned, managed, or controlled by the United States or any State or political subdivision thereof; or

(2) use the system established under this section to establish any system for the registration of firearms, firearm owners, or firearm transactions or dispositions except with respect to person, prohibited by section 922 (g) or (n) of title 18, United States Code State law, from receiving a firearm.^[30]

Beginning in 1979, the annual appropriations bills that funded the ATF and its predecessor agency prohibited the Department of Justice from centralizing the records of federal firearm licensees (FFLs), until the prohibition was made permanent in 2011.³¹ Also made permanent in that 2011 appropriations bill was another rider that prohibited the ATF from compiling a searchable registry of gun buyers’ names from business records transferred to the agency by FFLs who ceased doing business.³² A third provision in the same bill permanently created a 24-hour deadline for the destruction of identifying information on those who successfully undergo a NICS check.³³

Even Obamacare contains a number of provisions that prohibit information collected under its authority from being used to create firearm registries.³⁴

Meanwhile, there is no express authority in the enabling act under which this rulemaking is promulgated for BIS to collect and retain detailed information on the firearms owned by law-abiding Americans. Yet BIS is proposing to compel Americans to enter identifying information about themselves and their firearms into a federal database as a precondition of engaging in lawful travel with firearms. Individuals forced to comply with this requirement are given no assurances about how the information will be retained or protected or whether it will be available to other entities, and if so, under what circumstances. This clearly runs contrary to the spirit of congressional policy governing the handling of firearm owner information.

²⁹ 18 U.S.C. 922(f)(2)(C).

³⁰ 107 Stat. at 1542.

³¹ Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. No. 112-55, 125 Stat. 552, 609 (2011).

³² 125 Stat. 552, 610.

³³ *Id.* at 632.

³⁴ Patient Protection and Affordable Care Act, Pub. L. No. 111-148, 124 Stat. 119, 884-5 (2010).

The *de facto* federal firearm registry that would be created by forcing private gun owners to make detailed declarations about themselves and their firearms via the AES is another argument in favor of retaining the current procedure utilizing the paper Form 4457. That procedure vindicates the government's legitimate interest in monitoring the firearms that move and in out of the country but does not require the government to maintain a central registry of firearm owner information.

Going forward, any further attempt to automate the information private travelers must provide about their personal firearms should include express privacy provisions. At a minimum, these should prevent the dissemination or transfer of the information to other entities and require its complete destruction once CBP has verified that the firearms which were temporarily exported have been returned to the U.S.

For all these reasons, the NRA objects to the proposal's use of expanded data elements for private travelers seeking to utilize the BAG or TMP exceptions and urges that those requirements be omitted from the final rule.

III. The Final Rule Should Take Effect Immediately to the Extent Requirements Are Eliminated and Phase in Other Changes to Allow Regulated Entities Time to Adapt.

When the final rule governing Categories I, II, and III of the USML is published, certain changes should take effect immediately, while others should be phased in to allow regulated entities time to adapt.

Changes that merely eliminate requirements altogether should take effect immediately. For example, there is no justification for continuing to make "manufacturers" of articles that would be moved off the USML register with the Department of State.

On the other hand, where control of an item changes from the USML to the CCL, necessitating new procedures by the regulated entity, implementation of the final rule's effective date should be delayed to allow for new compliance systems to be established.

Licenses already granted under the ITAR should also be grandfathered for all outstanding transactions.

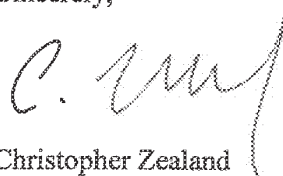
The NRA does not have any specific recommendations for a timeline of implementation for enforcing new requirements and procedures. We will defer to the entities whose day-to-day operations will be directly affected by the changes in the final rule.

Conclusion

The NRA is very pleased to see Export Reform finally turn its attention to Categories I, II, and III of the USML. The proposal charts a positive course that will contribute to national security, enhance the competitiveness of U.S. businesses, and benefit ordinary gun owners by mitigating the potential for export regulations to burden innocent conduct that does not implicate national security. We hope you will take the suggestions offered herein seriously to further promote the worthy goals of this effort, and we appreciate the opportunity to provide input.

We have also included our submission on the Directorate of Defense Trade Control's companion rulemaking and incorporate those comments herein by this reference.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Zealand", with a stylized flourish extending from the end.

Christopher Zealand
Senior Research Attorney
NRA-ILA

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-e2jd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2627

Comment on DOS-2017-0046-0001

Submitter Information

Name: M Perlmutter

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944p-yhc
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2628

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Baker

General Comment

U.S. firearms exported to Mexican police have been used in massacres and forced disappearances. We need international background checks to prevent gun exports to military and private groups that use them to commit violence or collude with organized crime.

At the core of these proposed changes is the mistaken belief that firearms do not merit tighter control because they are neither high-tech nor provide unique military advantages. In reality, these are some of the weapons most often used to commit abuses and extend conflict around the world. As such they deserve our highest scrutiny, not an easier path for sale and one without Congressional oversight. The policy continues the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

"The Trump administration's decision to relax regulations on the export of firearms will make it easier for terrorists, tyrants and criminal gangs to get their hands on the same dangerous firearms that have been used in mass shootings in the United States. This is a victory for the NRA and the gun industry and a loss for everyone else. Relaxing regulations on many firearms by putting them under the jurisdiction of the Commerce Department rather than the Department of State will make it harder to track where these weapons end up, and therefore easier for them to be diverted into the wrong hands. To make matters worse, Congress would no longer even be notified of major firearms exports, making it harder to do things like limit sales to the police in the Philippines who have been involved in assassinations of their own citizens -- as Sen. Ben Cardin, who blocked such sales in the past, has noted.

O, let America be America again --
The land that never has been yet --
And yet must be -- the land where every [one] is free.
Langston Hughes, Let America Be America Again

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-gdf7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2629

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vincent Bergan

General Comment

As a US citizen I am opposed to the new regulations which make it easier to sell high tech American made weapons overseas. It is dangerous because those weapons could easily get into the wrong hands and be used against Americans.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-222x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2630

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Couch

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting

made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-944p-mvip
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2631

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Mitchell

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military yet semi-automatic rifles are used in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns as well as any larger caliber firearm. Six U.S. states, DC, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by Congress to regulate the export of arms as the rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons which will limit its ability to comment on related human rights concerns, as it recently did on Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017 letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. The government taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking which will make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls for gun exports and would eliminate the State Departments

Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale but the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-tcnq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2632

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Lorioux

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-dyhs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2633

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin DeKlotz

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-3fdd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2634

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Heinz

General Comment

SIR/MADAM:

I oppose this rule change that would switch the regulations of firearms export from the US State Department to the US Commerce Department! It would eliminate the State Department's "Blue Lantern" program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would remove licensing requirements for brokers, increasing the risk of trafficking. Finally, it would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws. Since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the US and around the globe.

This seems like we are assisting a Russian Organized crime ring again!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944p-5ek5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2635

Comment on DOS-2017-0046-0001

Submitter Information

Name: Claudia Gibson

General Comment

Please do not unleash gun sales on the world & end up with thousands being killed JUST LIKE WHAT HAPPENS EVERY WEEK IN AMERICA!! The NRA should be sued for promoting death! And take theyre tax free status! Theyre totally political!
Fuck trump!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-f3z9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2636

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Fretwell

General Comment

Export weapons should not be under Department of Commerce. They are not to be trusted.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-8fn6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2637

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Skiles

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-8xrp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2638

Comment on DOS-2017-0046-0001

Submitter Information

Name: Donna Shuey

General Comment

I generally oppose regs that would make it easier to export guns from the US so I oppose any changes to current rules and regs.

Ex, Congress no longer being notified about large weapons sales is not acceptable.

The changes would present fewer obstacles for crime organizations to purchase large caches of weapons. Removing liscensing requirements is also a problem in my opinion.

None of the rule changes are acceptable and I urge you to oppose them.

Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944q-8vu5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2639

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Miller

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous! They are used to kill people every day around the world in acts of terrorism, organized crime, political violence and human rights violations. They should be subject to more controls, not less. The Commerce Department does not have the resources to adequately enforce export controls.

This rule change would remove essential safe safeguards that help keep extra-legal agents from obtaining the weapons that fuel violence that destabilizes countries and causes mass migration.

Please do the right thing and forgo this disastrous rule change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-zc6c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2640

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diana Smith

General Comment

I do not support switching the regulation of firearms exports from the State Department to the Commerce Department. This change facilitates exporting firearms to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Is America into making money for arms deals, or are we for stabilizing the nations on this earth, reaching for democratic peace for all.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-4m7c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2641

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Prosser

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-ggmr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2642

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roger Fretwell

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-hf5p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2643

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Mitchell

General Comment

As a concerned citizen, I oppose the NRA's push to move export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. I believe this transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are classified as military", which allows Congress to block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Finally, this rule change would eliminate some very important State Department programs, including; the State Departments Blue Lantern program, the licensing program for brokers, and the block on 3D printing of firearms. The bottom line is that firearms are extremely dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-v5mo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2644

Comment on DOS-2017-0046-0001

Submitter Information

Name: Linda Knudson

General Comment

: I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-ftzw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2645

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Black

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-ekqk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2646

Comment on DOS-2017-0046-0001

Submitter Information

Name: Heather Mulkerns

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. As a mother I am very concerned about gun violence in this country.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-dhs1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2647

Comment on DOS-2017-0046-0001

Submitter Information

Name: Felicia Feingersch

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Stop making guns easier to get!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-h4pb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2648

Comment on DOS-2017-0046-0001

Submitter Information

Name: virginia Feldman

General Comment

As a pediatrician, parent, and grandparent, I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in, increased health costs, environmental degradation, & lives..

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944r-opox Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2649

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brenda Smith

General Comment

I oppose the transfer gun export licensing from an agency (State Department) with a mission to promote stability, conflict reduction, and human rights, to an agency (Commerce Department) with a mission to promote trade and which lacks the resources to adequately enforce export controls. The propose agency is to promote commerce in this case -- weapons. There is enough conflict in the world; there is no need for more weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-lulp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2650

Comment on DOS-2017-0046-0001

Submitter Information

Name: Calli Madrone

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-zolk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2651

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ryan Taylor

General Comment

The proposed rule change:

- * Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- * Eliminates Congressional oversight for important gun export deals.
- * Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- * Removes statutory license requirements for brokers, increasing risk of trafficking.
- * Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- * Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- * The Commerce Department does not have the resources to enforce export controls, even now.
- * Reduces transparency and reporting on gun exports.
- * Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-86h9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2652

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-ky5z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2653

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Bell

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-q2uz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2654

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Heaney

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-txfo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2655

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jerry Charlson

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944s-sdbi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2656

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ronald Lynn White

General Comment

Please make sure that the proposed rule change DOES NOT:

Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminate Congressional oversight for important gun export deals.

Transfer the cost of processing licenses from gun manufacturers to taxpayers.

Remove statutory license requirements for brokers, increasing risk of trafficking.

Reduce or eliminate end-use controls, such as State Depts Blue Lantern program, or eliminates registration of firearms exporters.

Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Give the Commerce Department the responsibility to enforce export controls over semi-automatic assault rifles.

Reduce transparency and reporting on gun exports.

Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944t-r4eg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2657

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. Military style weapons like the AR 15 belong in the hands of US Military personel, not private citizens and not terrorists and crimals abroad.

This is yet another move that puts the profits of the US gun industry ahead of the US people and the people world wide. I thought Presiden Trump was going to drain the swamp rather than relocate it to his administration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944t-p3ul Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2658

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Foster

General Comment

What's being prepared is bad!

Potential points to make are that the proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals. Transfers the cost of processing licenses from gun manufacturers to taxpayers. Removes statutory license requirements for brokers, increasing risk of trafficking. Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. Reduces transparency and reporting on gun exports. Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944t-kmg5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2659

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Lindley

General Comment

If this proposed rule reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and eliminates registration of firearms exporters, a requirement since the 1940s, we will contribute to instability and threats to safety in other countries. That will only add to the need for immigrants and those seeking asylum in our country to flee their dangerous situations. Increasing the risk of arms trafficking is never in our best interests nor those of countries to which we export.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-tdc2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2660

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allison Fradkin

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-tdet Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2661

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leah Elkins

General Comment

This new rule would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international terrorists and criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of the gun industry. I am appalled at this administrations capitulation to the gun lobby which is now turning to the international market as gun sales decline in the US. I am concerned that the proposed rule does not adequately address our national security, foreign policy, international crime and terrorist threats. Congress and the public must be able to understand the impact of these rules on potential firearm exports. The proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-4gru Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2662

Comment on DOS-2017-0046-0001

Submitter Information

Name: Chris Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-zaf2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2663

Comment on DOS-2017-0046-0001

Submitter Information

Name: BRUCE ALDER

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-mowr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2664

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tenille Woodward

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-3rev Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2665

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Ayers

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We shouldn't have assault style weapons available to individuals at home or abroad as they were designed as weapons of war, and as such should be restricted to military use. Why facilitate deranged parties acts of mass murder whether it be at home ore elsewhere?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-nvem Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2666

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nathaniel Watkins

General Comment

I oppose this regulation change. The only parties who stand to benefit are arms manufacturers. Meanwhile, the lax enforcement capabilities of the Department of Commerce will make it easier for US made arms to find their way into the hands of people who would use them against us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-r8ir Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2667

Comment on DOS-2017-0046-0001

Submitter Information

Name: B.L. Melton

General Comment

I oppose the proposed change of export licencies from the State Department to the Commerce Department. This transfer includes assault weapons and other powerful firearms and will make it easier to export U.S. guns and ammunition globally. These exported firearms are already being used in crimes, attacks and human rights violations in many other nations.

A change to the Commerce Department will increase the number of export applicants by 10,000 annually, according to the Dept. of Commerce estimates. This change will only benefit the arms business, and cause many more deaths and destruction worldwide.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944u-aqgl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2668

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Schoene

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. What is the purpose of making this change -- the export of many more firearms, including weapons of mass murder? Isn't it enough that America is drenched in privately-owned guns -- including assault rifles -- and suffers from the highest rates of gun violence and gun deaths in the world -- by a mile? We want to infect the rest of the world with our unique kind of insanity? Well I say "NO we do not!"

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944x-h8ci Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2669

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynn Baldwin

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944x-s54y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2670

Comment on DOS-2017-0046-0001

Submitter Information

Name: Valerie Cooper

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944y-7vwa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2671

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erika Benda

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-3pl5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2672

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dale Goodno

General Comment

I am in favor of moving export license oversight for firearms from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-czqc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2673

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robin Kline

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-n9hb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2674

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Kaszyca

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Our country is flooded with weapons already and now we want to flood the world with even more. Obviously this is about profit for the weapons industry and does nothing but make our already dangerous world more dangerous. This rule change is unacceptable and I expect someone there knows it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-944z-l8fu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2675

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn Livingston

General Comment

Dear sir

I am writing to oppose the proposed changes to the regulation of domestic Firearm sales to foreign purchasers. The United States has supplied weapons to foreign groups in the past only to have those same weapons used against our own military personnel. Mistakes were made in the past but I would rather arms sales were regulated by the State Department whose aim is to protect the safety of our nation. The Commerce Department has a goal of increasing our sales and isn't tasked with determining whether those sales constitute a future danger to our country.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9450-80cc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2676

Comment on DOS-2017-0046-0001

Submitter Information

Name: Megan Epperson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9450-qa2q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2677

Comment on DOS-2017-0046-0001

Submitter Information

Name: Megan Epperson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9450-53dn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2678

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andy Winger

General Comment

The price is too high ... in lives destroyed. The arms industry relies on our government to pass legislation that helps them and hurts the rest of us. Modern governments should have the people's best interests in mind. That's what our founding father's risked their lives for.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-7cvn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2679

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Dortenzio

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-w3e5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2680

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelly Warnberg

General Comment

I am disgusted that the United States seems to be determined to share its gun problem with the rest of the world! I am strongly opposed to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rule's elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobby's influence in the rule's description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my power peacefully and democratically to hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-v14t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2681

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dave Riley

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-b7xs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2682

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Mindell

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-998b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2683

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Brenner

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

Elizabeth Brenner 97232

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-onbx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2684

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Kleinschmidt

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9451-45ix Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2685

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please, please no! I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-3vjo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2686

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Whitter

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-3s5j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2687

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Stibolt

General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates critical Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. This change seems poorly thought out and completely unnecessary.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-uv2d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2688

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Brackett

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The public needs MORE information not less about firearms both domestically and internationally.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

I think the level of criminality in Central America and Mexico has been partially enabled by guns from the USA ending up in gangs and drug cartels. This has also encouraged the surge in Asylum seekers. Lets not make gun sales easier.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-gsn3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2689

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jacqueline Brandt

Organization: Ms.

General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the US taxpayers; enables 3D printing of firearms and allows weapons of war to more easily proliferate throughout the world. The rule change significantly increases profits to the American gun industry while the entire world pays the cost in lives. The ethical choice is clear.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-5ggs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2690

Comment on DOS-2017-0046-0001

Submitter Information

Name: Polly Robinson

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-dy71 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2691

Comment on DOS-2017-0046-0001

Submitter Information

Name: Walter Mintkeski

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

Nate Smith, Chair of the Military, Security and Police Transfers Thematic Group at Amnesty International USA, said of the proposed rule changes: While these changes are somewhat obscure and bureaucratic, they pose very concrete and real risks to human rights and peace efforts around the world and to national security here in the US.

Please heed Mr. Smith's warnings.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-uphs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2692

Comment on DOS-2017-0046-0001

Submitter Information

Name: Thomas Callanan

General Comment

Stop this crazy proliferation of guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-q0kd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2693

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Stone

General Comment

I join all those Americans who ask you to reject this proposed rule.
This proposal would make it easier to export U.S. guns and ammunition globally, even though U.S.-exported firearms are already used in many crimes, attacks and human rights violations in many other nations.

There are many problems with this proposal, including it:
Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.
Transfers the cost of processing licenses from gun manufacturers to taxpayers.
Removes statutory license requirements for brokers, increasing risk of trafficking.
Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
The Commerce Department does not have the resources to enforce export controls, even now.
Reduces transparency and reporting on gun exports.
Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PLEASE REJECT THIS PROPOSAL!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-qba4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2694

Comment on DOS-2017-0046-0001

Submitter Information

Name: Teresa Rowan

General Comment

I am a retired social worker, mother of three and active voter and community member. I am all too aware of the devastation that gun violence has exacted on our communities here in the US. I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9453-bgbr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2695

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Brock

General Comment

Can we please be a model for the world to look to on matters of peace and justice, beginning with our policies on gun exports:

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-el3x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2696

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martin Horwitz

General Comment

The State Department should continue to control firearms.

Firearms are classified as "military" for a good reason, and their regulation is much more appropriate under the State Department than the Department of Commerce.

Firearms are in need of much more regulation that they are currently, and that regulation should remain under the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-rqs5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2697

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Ayres

General Comment

The Commerce Department does not have the resources adequately to enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Firearm exports should continue to be regulated by the State Department. There is a compelling reason they are, and have long been, regulated by State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-nk0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2698

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Comfort

General Comment

Wage peace. Sell building technology. Use tax money for uplifting not destroying.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-11ag Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2699

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9454-wlps
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2700

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Black

General Comment

I am a parent, educator, retiree and my wife and I oppose the proposed rule for the following reasons: The proposed rule treats semi-automatic assault rifles as non-military. But many groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, DC, and several large retail chains also prohibit retail sale of semi-automatic assault rifles.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. Senators have explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. Taxpayers will absorb the cost of reviewing applications and processing licenses.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule reduces controls for gun exports. It would eliminate the State Departments Blue Lantern

program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-80ds Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2701

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-6qjx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2702

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Johnson

General Comment

I respectfully request that this proposed rule change be defeated. Among the reasons are that it

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7.The Commerce Department does not have the resources to enforce export controls, even now.
- 8.Reduces transparency and reporting on gun exports.
- 9.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Points 1 and 9 above are especially compelling. We definitely should not export our gun violence problems to the rest of the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-cz37 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2703

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-kbj0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2704

Comment on DOS-2017-0046-0001

Submitter Information

Name: Charlotte Smith

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9454-ionu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2705

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Winterhalter

General Comment

I am writing to ask that you not approve the rule change that would switch the regulation of gun exports from the State Department to the Commerce Department. In this era of global tension and terrorism, it makes no sense to increase opportunities for other countries to have access to the weapons that could be used to terrorize people around the world.

Thank you for your consideration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-a4gy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2706

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Tharrett

General Comment

This country cannot even control what is going on here with our homegrown terrorists & these guns, especially the weapons used by our military & designed for our military like the AR-15. The President appeases the gun lobby with these ideas, but that is just a fraction of the population & only serves his political purposes. We need to get our house in order. Contrary to Mr. Trump's opinion the United States does not need to be like Russia. He wouldn't even need to come up with schemes like this for trade, had he not alienated our closest allies like Canada who we had a trade deficit with, they spent more money here than we did there. I'm praying that someone who works in this government now & has control, uses common sense in this case & acts responsibly.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-cri9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2707

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alejandro Sahagun

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-h6c5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2708

Comment on DOS-2017-0046-0001

Submitter Information

Name: joanne groshardt

General Comment

the proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-hqwu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2709

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joyce Dixon

General Comment

The proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9455-v0xs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2710

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joyce Dixon

General Comment

The proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-qhqv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2711

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel West

General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-pv21 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2712

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paula Joyce

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-415b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2713

Comment on DOS-2017-0046-0001

Submitter Information

Name: Doug Dicharry

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This proposed transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-u1me Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2714

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steve Hallock

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-f8w1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2715

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dick Brown

General Comment

This isn't hard, it's transparent! We already allow OUR OWN gun manufacturers to distribute their wares virtually throughout our republic with hardly an eyebrow raised. Just imagine YET ANOTHER tidal wave penetrating our ports and borders! The irony here is that our President, Donald Trump, moans about how porous our borders every day of the week. Please help me here--how could this hare-brained idea have any prayer of working? No?!!! Right, I didn't thing so!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-hqjp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2716

Comment on DOS-2017-0046-0001

Submitter Information

Name: J.A. Titone

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9456-ueej Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2717

Comment on DOS-2017-0046-0001

Submitter Information

Name: Melanie Steffl

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-tb9d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2718

Comment on DOS-2017-0046-0001

Submitter Information

Name: terry barth

General Comment

I am opposed to changing the regulation of firearms from our State Dept. to our Commerce Dept. The NRA wants as many guns in as many hands as possible, they are not interested in the safety of the general public!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-7lg9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2719

Comment on DOS-2017-0046-0001

Submitter Information

Name: Heather Birdsong

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-2iil Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2720

Comment on DOS-2017-0046-0001

Submitter Information

Name: Caitlin Mears

General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the U.S. Commerce Department because I believe that leaving this responsibility to the U.S. State Department maintains the safety of Americans, as opposed to the best interests of corporations and their shareholders.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-q4f5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2721

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mandy Gregory

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They are killing more innocent people than ever, CHILDREN! Be humane, think of your family. Be on the right side of history, there should be subject to more controls, not less! How do you want to be remember, as a greedy selfish person who leads their innocent constituents to suffering or do you want to be remember for standing up to big corps and NRA (the devil) and taking care of your people. We all want the same thing, to be happy, safe and healthy.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-ib9h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2722

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the U.S. Commerce Department because I believe that leaving this responsibility to the U.S. State Department maintains the safety of Americans, as opposed to the best interests of corporations and their shareholders.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9457-qv9n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2723

Comment on DOS-2017-0046-0001

Submitter Information

Name: Trish Smith

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We do not need to spread violence for commercial gain!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-67de Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2724

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eileen Chieco

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world as this is how they make money. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

With the proposed rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns. Moreover, the Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Thus, firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additionally, the rule change would make the world a more dangerous place for the following reasons: It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

In summary, firearms are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-2gur Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2725

Comment on DOS-2017-0046-0001

Submitter Information

Name: NANCY HALDEN

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-t8lu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2726

Comment on DOS-2017-0046-0001

Submitter Information

Name: Scott Zorc

General Comment

I oppose the transfer of firearm export authority from the State Dept. to the Commerce Dept. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-v3h8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2727

Comment on DOS-2017-0046-0001

Submitter Information

Name: Steven Posner

General Comment

The problem with indiscriminately arming nations is like the weather: If you like a current regime, wait a decade or two and it will change--often to one opposed to the United States. Accordingly, the decision whether to arm a regime is better assessed by the State Department than the Commerce Department, whose emphasis is promoting trade. The proposed rule is short-sighted and should be rejected.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-jsj4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2728

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gretchen Crook

General Comment

Against this transfer of authority
Treats semi-automatic assault rifles as non-military

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9458-uwv0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2729

Comment on DOS-2017-0046-0001

Submitter Information

Name: Arlene Gardner

General Comment

Please do not transfer firearms regulation to the Commerce Department. It more appropriately belongs to an agency promoting conflict resolution.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-r3r2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2730

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

- by eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- by removing licensing requirements for brokers, increasing the risk of trafficking.
- by removing the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please leave the regulation of firearms exports under the jurisdiction of the State Department.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-kdkz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2731

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sally Misencik

General Comment

Please do not let Commerce Dept in charge of weapons sales from USA.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-a3yd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2732

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jules Abate

General Comment

To Whom it May Concern;

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Thank you,
Jules Abate

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-wtrb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2733

Comment on DOS-2017-0046-0001

Submitter Information

Name: C.A. Incze

General Comment

I strongly oppose moving firearm export license oversight from the State Department to the Commerce Department. This rule change would eliminate necessary and crucial Congressional oversight for gun export deals, enable the 3D printing of firearms and allow weapons of war to more easily proliferate throughout the world. This rule change increases profits to the American gun industry while the entire world will pay the cost in lost lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-gh2s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2734

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brenda Crouser

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-l4zx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2735

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I want to make these points about the proposed rule:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-z5sc Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2736

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Heavey

General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9459-83td Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2737

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cynthia O'Neill

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I oppose switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Exports such as these belong to the State Department to handle. This is not commerce - this is exploitation by a lobbying organization to spread its influence around the world without regard to public safety. We need to reduce gun violence. Changing this regulation from the U.S. State Department to the U.S. Commerce Department effectively increases gun violence. This MUST NOT HAPPEN.C

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-ii1o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2738

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hugh Gurney

General Comment

I am opposed to moving the authority to regulate export of firearms from the State Department to the Commerce Department. I think the State Department is better equipped to review proposals to ship exports of firearms and is in a better position to block such exports to rogue countries where they could be used by the authorities to stifle people's right to protest against the government. We need to be very careful of whom we export dangerous firearms to and the State Department is better equipped to do that.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-wu7o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2739

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Joyner

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-uyrg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2740

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Worth

General Comment

I oppose the NRA-proposed rule change to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

The State Depts mission is to safeguard our nation; the Dept of Commerces mission is to promote American business.

Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additional threatening effects of the rule change:

1. It will eliminate the State Departments Blue Lantern program, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them;
2. It will remove licensing requirements for brokers, increasing the risk of trafficking;
3. It will remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PLEASE DO NOT LET THIS RULE CHANGE TAKE EFFECT. Our national security is more important than the profits of gun manufacturers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-h88n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2741

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Flournoy

General Comment

This seems like a particularly bad idea to me. These firearms are not only for the hunting enthusiast and hobbyist, but are used as weapons of conflict across the world. That would be the purview of the State Department, not the Commerce Dept. I respect the right of American citizens to own guns, but I do not want to provide the gun industry any greater latitude in their lucrative business of selling weapons around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-alxm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2742

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Gentry

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-7ab7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2743

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Hanks

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. War is not the answer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-j3ey Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2744

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pam Elders

General Comment

As a taxpaying, American citizen I am vehemently opposed to this proposed rule change to move the handling of export licenses of semi-automatic assault-type weapons and other powerful firearms to the US Commerce Department.

This is foolhardy and clearly not in the interests of national security. Such a move would mean Congress would not be automatically informed of the sale of large caches of firearms to foreign countries. No prudent person would think giving private arms companies the go-ahead to sell dangerous weapons overseas without proper vetting is a good idea.

Largely unregulated arms sales could endanger our national interests and security. Lack of oversight would permit arms sales to anyone, including our enemies. Furthermore, why would we want to threaten world stability and undermine our own global diplomacy as well as that of our allies?

I think that trail leads to the National Rifle Association and its lobbyists. This transfer of authority must not be approved; to do so, is to embrace an unethical and inhumane practice which will only smear our international reputation and harm our diplomatic efforts for peace. Please retain administration of export licenses with the State Department. Peace over profits.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-btua Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2745

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert and Paula Lund

General Comment

Please dont change the rules that are currently in place for trafficking of arms . There is no GOOD reason to change the current regulations .

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945a-97vw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2746

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen Wheeler

General Comment

he bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-o6t5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2747

Comment on DOS-2017-0046-0001

Submitter Information

Name: N. Dumser

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-sxek Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2748

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Raeburn

General Comment

Dear sirs and madams: Please note that I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Public safety requires that there are continuing checks and balances on the sale of firearms.

Yours truly,

Dr. Susan Raeburn

Oakland, CA

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-z381 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2749

Comment on DOS-2017-0046-0001

Submitter Information

Name: KYNA MOSER

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-qrx Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2750

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Heaney

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I want to see greater controls on gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945b-mw0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2751

Comment on DOS-2017-0046-0001

Submitter Information

Name: Samantha Chang

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This is a matter of national security and should be treated as such by remaining under the control of the US State Department.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-945b-ibm4
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2752

Comment on DOS-2017-0046-0001

Submitter Information

Name: Drew Martin

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Extensive trafficking in firearms contributes to violence around the globe. The world is awash in firearms, particularly military style weapons. Many weapons end up in the hands of pirates, terrorists, criminals and poachers. Wildlife poaching is a major cause of loss of wildlife. We do not need to make it easier to transport firearms around the world. We should be making it more difficult.

Firearms exports are increasing the danger that people and animals face around the planet. We need to work to actively reduce the amount of firearms not make it easier to export them.

I oppose this proposal for all the following reasons as well as those I have outlined above.

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic

assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-yk0e Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2753

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lee Clapp

General Comment

I strongly oppose moving oversight of firearm export licensing from the Department of State to the Department of Commerce.

The proposed rule change treats semiautomatic weapons as "non-military," which is absurd. Moreover, the proposed rule eliminates Congressional oversight of gun export deals, transfers the cost of processing licenses from gun manufacturers to tax payers, and enables unchecked gun production in the U.S. and exports abroad by removing the block of 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-m2ta Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2754

Comment on DOS-2017-0046-0001

Submitter Information

Name: Meredith Roach

General Comment

I am writing in response to the proposed policy to make it easier to export U.S. guns and ammunition globally and the move of export licensing from the State Department to the Commerce Department. We do not need to make it easier to export guns. There are enough in the world. The only reason for this proposed changes is to benefit the gun lobby. Here are other reasons why this should not happen:

- It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- It eliminates Congressional oversight for important gun export deals.
- It transfers the cost of processing licenses from gun manufacturers to taxpayers.
- It removes statutory license requirements for brokers, increasing risk of trafficking.
- It enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- It reduces transparency and reporting on gun exports.
- It transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

All of these reasons make this policy change ridiculous and terrifying. Please please do not allow this policy to go through. We have enough gun violence all over the world. Why create an even easier path to gun violence and human rights violations?

Thank you,
Meredith Roach

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-c6jh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2755

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Usdan

General Comment

I OPPOSE the proposal. It would make America LESS SAFE. The proposal weakens controls over semiautomatic assault weapons including AR-15s and AK-47s, 50 caliber sniper rifles, and high-capacity ammunition magazines. It may also deregulate 3D printing of guns and could ultimately weaken controls on firearm imports. The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups. The proposed rules are a priority for the National Rifle Association and the National Shooting Sports Foundation (the official trade association for the firearms industry) who want to open up international markets to compensate for lagging domestic gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-oyqt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2756

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eve Shapiro

General Comment

This rule change would make the world a more dangerous place.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945c-x940 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2757

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelly McCurdy

General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the Commerce Department. It is unnecessary and would make it easier for terrorists to acquire the firearms they desire.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-btpy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2758

Comment on DOS-2017-0046-0001

Submitter Information

Name: DeSean Freeman

General Comment

In order to accurately and adequately account for the direct correlation between firearms possession and the violence associated with it, 'repeal' the "Dickey Amendment" barring the national Center for Disease Control and Prevention (CDC) from studying firearms violence. Seems simple, does it not?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-858z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2759

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sally Cairnes-Wurster

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The oversight is necessary for gun export deals, to make sure these firearms don't just go to the highest bidder, ie. terrorists and criminals. Plus this will have the US taxpayer on the hook for the costs of processing! It enables 3D printing of firearms as well.

No to this BS!

Sally Cairnes-Wurster

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-d5tg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2760

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nykole Sutherland

General Comment

The commerce department is absolutely NOT the appropriate regulatory body for deadly weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-6bql Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2761

Comment on DOS-2017-0046-0001

Submitter Information

Name: Julie Buckner

General Comment

I am writing to voice my strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms more dangerous by transferring controls to an agency that prioritizes business interests over national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also concerning. This rule seems designed to create profits for the U.S. gun industry. The rules description of semiautomatic assault rifles like the AR-15 as civilian products is also concerning. These weapons were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. Please do not go forward with this dangerous policy.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-299x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2762

Comment on DOS-2017-0046-0001

Submitter Information

Name: matthew cazier

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-iogf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2763

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the change of regulation of the selling of firearms to other countries--it needs to stay in the state department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-tgf8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2764

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Niemi

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-5fg8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2765

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Hanauer

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Arms sales need to be carefully regulated so we do not sell weapons to terrorists and others who pose threats to our national security. The US Commerce Department does not have the resources for this and will undoubtedly favor sales over security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945d-tik3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2766

Comment on DOS-2017-0046-0001

Submitter Information

Name: k danowski

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-945d-b12y
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2767

Comment on DOS-2017-0046-0001

Submitter Information

Name: Virginia Phillips

General Comment

I am speaking out against the proposed policy of exporting ammunition and guns globally from the United States. We have a culture of war. Providing weapons to facilitate the ease of war is not in anyone's best interest. The proposed rule changes do the following, and are of grave concern:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

This is a dangerous proposal and should be squashed immediately.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-ds7z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2768

Comment on DOS-2017-0046-0001

Submitter Information

Name: K Newman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-ga8h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2769

Comment on DOS-2017-0046-0001

Submitter Information

Name: Chagit Steiner

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-lspe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2770

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mitchell Zito

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-ga34 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2771

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen O'Neal

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945e-2zlx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2772

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debbie Lyman

General Comment

I believe this rule change is dangerous and unnecessary. It would facilitate firearm exports to more easily be sent to repressive regimes and terrorist organizations. It removes safe-guards that have been in place for decades. This is a bad idea and should not happen.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945f-zizx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2773

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vicki Brown

General Comment

I vehemently oppose the rule change that would switch regulation of firearms export from the US State Department to the US Commerce Department. This is very, very dangerous. Firearm traffickers, organized crime, terrorist organizations among others would love to have this happen. The world is already a dangerous place. We don't have to make it worse. Just so some people can get richer. Please stop this. It doesn't make any sense at all. We're better than this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945g-e47m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2774

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am opposed to the Trump administration proposed to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. These are the reasons that I am concerned:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually. The fact that this proposal applies to assault weapons and other powerful firearms typically used in the military is concerning in that terrorist organizations may be able to easily get their hands on these weapons. We do not need to increase the potential use of weapons whether they are here or exported abroad. Thank you for your consideration of this serious matter.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945g-587t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2775

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in support of this proposal. The current ITAR regulations, as imposed upon gunsmiths, are stifling to business. The modern gunsmith will perform tasks such as barrel replacement, muzzle threading, and other tasks that do not make him a manufacturer by the common definition of the word, but subject him to manufacturer regulations and fees. The overwhelming majority of these small businesses operate on very thin margins as a general rule anyway, and most will never export a single product outside the US. To include common sporting rifles like the Remington 700 or even the semi-automatic AR15 under this regulations is simply ludicrous and needs to be changed. Ignore the comments in opposition, not one of them knows what they are talking about, they simply oppose this common sense measure because it will benefit 2nd Amendment advocates.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945h-8klp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2776

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanna Bortz

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. The Commerce Department does not have the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945i-u5ms Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2777

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kim LeBlanc

General Comment

I oppose the proposed rule change because it will do the following:

- Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminate Congressional oversight for important gun export deals.
- Transfer the cost of processing licenses from gun manufacturers to taxpayers.
- Remove statutory license requirements for brokers, increasing risk of trafficking.
- Reduce or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduce transparency and reporting on gun exports.
- Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please oppose the proposed rule change. This matter was brought to my attention by Texas Gun Sense. Our country does not need reckless laws and rule changes such as these that undermine common sense gun safety. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945i-bpgm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2778

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Hamilton, LMT

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945i-pyer Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2779

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanne Skirving

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change would eliminate necessary Congressional oversight for gun export deals, place the cost of processing licenses on U.S. taxpayers, enable 3D printing of firearms, and allow weapons of war to more easily proliferate throughout the world.

The rule change would increase profits to the American gun industry while the entire world would pay the cost in lives lost.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945j-8rt5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2780

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shoshana Katz

General Comment

Seems like people in the business of selling guns, want to be able to sell a lot more of them. As if we do not have too many guns all over the place. Scary.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945k-enzg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2781

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robin Johnston

General Comment

Please do not loosen gun export regulations. OMG. What kind of world do you want??
Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945m-5tst Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2782

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Jane DelMastro

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945m-qtp Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2783

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Wills

General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945m-29f6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2784

Comment on DOS-2017-0046-0001

Submitter Information

Name: M.A. Whelan MD

General Comment

I believe the State Dept., should remain in control of the export of arms. Transferring this to the Commerce Dept. will emphasize only the commercial aspects, which would be a grave error!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-l7hh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2785

Comment on DOS-2017-0046-0001

Submitter Information

Name: A. S.

General Comment

Please stop the NRA backed rule and re-consider how your proposed regulations will change the face of safety in our society using the following points:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am the mother of 5 children who deserve to be safe and protected. Please stop this!
A.S.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-9cfg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2786

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Rice

General Comment

Hello,

If you're being mugged and you have a gun, would you hand it over to them? President Trump's proposal to lift the current regulations exports seems to be doing the same thing. I believe the the inherently military nature of these firearms means that the sale of them is an issue of national security. I feel very strongly that the gun export laws should stay as they are. Why would we make it easier for potential terrorists or international criminals to obtain lethal weapons?

Thank you for your time.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-85nf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2787

Comment on DOS-2017-0046-0001

Submitter Information

Name: Skip Polson

General Comment

I am opposed to this rule change because:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do everything you can to stop this proposed rule change.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-ke9a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2788

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeff Egerton

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-rotk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2789

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leslie Aldridge

General Comment

Although I am not currently an NC resident, I am a graduate of UNC Chapel Hill and have relatives and friends who do reside in NC. I am proud to currently reside in Maryland, a state with some of the country's most stringent gun laws. Please take the opportunity to follow Maryland's example and stop legislation that will benefit gun lobbyists and endanger the lives of more American citizens.

Thank you - Lesmusic60@gmail.com

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-flfe Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2790

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Brady

General Comment

I am a tax-paying citizen who is concerned about the consequences of this proposed rule change.

Please consider other alternatives to this proposed rule that would:

1. Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. Remove licensing requirements for brokers, increasing the risk of trafficking.
3. Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-s8tb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2791

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945n-gncv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2792

Comment on DOS-2017-0046-0001

Submitter Information

Name: Harriet Solomon

General Comment

The proposed changes in the rule regarding international arms regulations are RECKLESS. Lives around the world will be endangered by international and domestic criminals. It boggles the mind that an American administration can be so blind to the effect of these changes on the freedom of the traveling public to go anywhere without fear of gun violence; on the freedom of Americans to go about their business in their own country; and on the general safety of the world at large.

Please do not change these rules so drastically. They've been in place since 1940; they still work. You are hurting us, your constituents, whom you promised and swore an oath to protect against all enemies, foreign and domestic. These rule changes violate that oath on every ground.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-my14 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2793

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Napier

General Comment

I oppose this proposed rule for the following reasons, and for my belief that will make our world even for violent. Congress is shirking their responsibility in protecting the American people.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-yc27 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2794

Comment on DOS-2017-0046-0001

Submitter Information

Name: Emily Skidmore

General Comment

I am concerned that this proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Everything Ive heard from this administration is that they want to protect citizens from terrorists and that focus has been on immigration. Ive also heard the NRA say they fully support keeping weapons out of the hands of dangerous people but this rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-zsxn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2795

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Ortiz

General Comment

I strongly oppose this proposal to transfer the oversight of weapons export from the State Dept. to the Commerce Dept. The change is only for the benefit of the gun manufacturers to increase their profits and to weaken law enforcement over firearms trafficking to shady gun dealers. The security of civilian citizens here and abroad would be at risk for the following reasons.

The proposed change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945o-f2co Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2796

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kicab Castaneda-Mendez

General Comment

I adamantly oppose the proposed rule change because of its negative impact on both the domestic and international fronts.

The proposed rule would dramatically change the regulatory structure for firearm exports--in a way that makes it appears to be largely driven by the interests of industry.

It's complexity raises the concern that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. In addition, I am concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Specifically, these the rule changes that would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-zgj6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2797

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elziabeth ODear

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-84wk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2798

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lawrence Turk, RN

General Comment

No, dont loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule appears to be largely driven by the interests of industry.

The proposed rule does not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. Also, the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Dont eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Dont remove licensing requirements for brokers, increasing the risk of trafficking.

Dont remove the State Departments block on the 3D printing of firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-1zyb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2799

Comment on DOS-2017-0046-0001

Submitter Information

Name: George Shafer

General Comment

This rule would make it much more dangerous for Americans traveling abroad, especially at a time when Trump has turned so much of the world against the US with his bullying

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-6k55 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2800

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Clarke-Pearson

General Comment

I am a North Carolina pediatrician. I am opposed to this proposed rule: International Traffic in Arms Regulations.

In a time of great national concerns about keeping our country secure, this proposed rule MAKES NO SENSE.

Specifically, it will eliminate the State Dept BLUE LANTERN program which carries out hundreds of post shipment and pre license inspections and reports these actions to the public.

Please listen to the citizens of the USA like myself and don't put us in jeopardy with this proposed rule.

Thank you.

Kathleen Clarke-Pearson MD FAAP

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-3pwg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2801

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tara Pressley

General Comment

I oppose the passing of this rule that would loosen regulations on weapon exports because it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. This rule should not pass.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-m6ny Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2802

Comment on DOS-2017-0046-0001

Submitter Information

Name: Colleen Shearer

General Comment

I am against a Trump Administration rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-q40s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2803

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandy Irving

General Comment

I oppose this rule change.

This rule change would make the world far more dangerous by

Eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on th

Removing licensing requirements for brokers, increasing the risk of trafficking.

Removing the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-rfu5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2804

Comment on DOS-2017-0046-0001

Submitter Information

Name: Josephine Corro

General Comment

I am commenting on the new rule proposed by the Trump Administration that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. I am concerned that the proposed rule will not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-t4zq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2805

Comment on DOS-2017-0046-0001

Submitter Information

Name: frances elsemore

General Comment

Questions relating to weapons should be decided with safety as a priority, not profit.
Please do not make the world a more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-4z8y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2806

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stefanie Mendell

General Comment

I oppose the Trump Administration's proposed new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I also am concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

I oppose the proposed rule because it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

I oppose the proposed rule because it would remove licensing requirements for brokers, increasing the risk of trafficking.

I oppose the proposed rule because it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945p-cd4j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2807

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cate Pracey

General Comment

I think this violates the principle of spreading non violent democracy to the world and strongly disagree with this proposal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-5yhi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2808

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martin Washburn

General Comment

Deregulation of weapons sales allows the use of secondary purchases giving a path for military supplies to reach the terrorists we are trying to defeat.
This contributes to the never-ending war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-77hg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2809

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shana Whitehead

General Comment

I oppose.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-71wh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2810

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please uphold rules and regulations on gun exports.
These rules help keep people safer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-8mci Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2811

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Roblee

General Comment

The Trump Administration has formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. I am concerned that the proposed rule does not adequately address our national security, international crime, or terrorist threats.

The administration should not move forward with the proposed rule, but should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-zl39 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2812

Comment on DOS-2017-0046-0001

Submitter Information

Name: Priscilla Crow

General Comment

Seriously? Why in the hell would we want to ship guns, of ANY kind, to other countries? Was that another item on Putin's "Honey Do" list for his bitch Trump?

Wait - I remember. The NRA is just another extension of the Kremlin. That's a double-debt for the GOP!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-6pfv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2813

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Kleba

General Comment

This is pure greed on display. The gun industry serves the purpose to kill. International sentiment seeks to reduce weapons of mass destruction even as the United States attempts to mass distribute guns. The quantities of guns being distributed for profit will eventually rival the same mass destruction as large weapons. This must be stopped.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-kcrq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2814

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am a citizen of the USA and resident of the state of Michigan.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

More reasons exist to stop these unwise changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-dhww Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2815

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-945q-rryc
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2816

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Walters

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-woxy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2817

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Goodkind

General Comment

The Trump administration has proposed changes to the agreements affecting the sale of weapons abroad that I believe would make the world a more dangerous place. Please don't value commercial gain as more important than keeping all of us safe.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not dismantle important protections that have served us well and that we still need.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-t2y9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2818

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dorothy Potter Snyder

General Comment

To Whom It May Concern:

It would ask that you preserve the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Eliminating these licensing requirements for brokers will increase the risk of illegal firearm trafficking.

Please also preserve the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The government's first job is to protect the people. Opening the door to the spreading of unlicensed firearms to whomever, wherever is inconsistent with the spirit of firearms laws and your obligation to protect the safety of the American people.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-c7n4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2819

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kimberlee Tellez

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-ungq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2820

Comment on DOS-2017-0046-0001

Submitter Information

Name: Liz Ofstad

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-9br8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2821

Comment on DOS-2017-0046-0001

Submitter Information

Name: Monica Ortiz

General Comment

My name is Monica Ortiz and I am a registered voter in Wellington, Florida. My only concern is to save lives. One life is worth more than all the guns in the world. We need to have common sense gun laws on the books. Not laws that make it easier for guns to get into the hands of someone who means to do harm to others. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. This proposed rule must not be put in place!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-1mzc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2822

Comment on DOS-2017-0046-0001

Submitter Information

Name: George Phillips

General Comment

This rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-xodx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2823

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karen Puffett

General Comment

I am very OPPOSED to the proposed regulation to move the firearms exports from the State Department of Commerce.

The State Departments oversight and regulatory authority is critical to our countrys safety by monitoring weapons domestically and those coming into this country. Since most types of firearms can be used for military and terrorist activities and they should remain under the scrutiny of the Department of State for our protection rather than Department of Commerce for promoting export of our goods with little oversight.

If the regulatory rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Additionally, the Commerce Department just does not have the resources to adequately enforce export controls which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The end result is firearms will be exported to anyone with money.

For the safety of the people of our country and the world, PLEASE DO NOT approve this move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-xe5a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2824

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Lee

General Comment

We know that gun violence spreads like a virus, from one person/family to another and across communities and states. Simply being close to a gun increases the chances that you will be harmed, domestic violence, suicide or accidentally. Gun violence is an epidemic in America, spreading like a wildfire in California. Please don't export this violence to other countries which would make gun violence a pandemic, like the deadly flu in 1918. It was not a disease that could be controlled. This violence will circle back through America ten-fold and may revisit it's deadly effect on you or your family.

As a physician, I stabilize patients using the ABCs first, Airway, Breathing, Circulation, the most necessary functions to keep one's body alive. Sometimes that means we don't treat the cause of their emergency first. We stabilize the airway so they can get air in, we ensure they can oxygenate effectively and then we make sure their heart is working and their blood pressure is adequate to perfuse the brain. Once we know those major organs are taken care of, we can begin to search for a cause. First, we have to buy ourselves time to work. We can continue to talk about the causes of gun violence but first we have to stop the gun deaths and stabilize the situation to give ourselves time to come up with reasonable plans. For now, stop spreading the gun violence by making more guns, transporting more guns and making it easier to get guns, even temporarily.

Ideally, if at least temporarily, HALT gun sales. There are more than enough guns on the market for people to sell to each other. Let's discuss this without all the rhetoric, without the NRA. Let's look at the science. Don't spread this epidemic. ABCs, stop the bleeding.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-299d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2825

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lydia Pyun

General Comment

It is appalling to hear that our gov't wants to make selling weapons easier which will help the terrorists even more. It's a well known fact our gov't has created or emboldened terrorist organizations due to lack of foresight and/or corruption.

It is ludicrous to ease sale of weapons which will empower and strengthen terrorist organizations. Trump's plan is a terrible plan and must not proceed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-wmpr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2826

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nicholas Britten

General Comment

Im Nick Britten and Im for increased gun safety around the world. For that reason Im against this proposal. More specifically Im against this proposal because it does the following things:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-fjxi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2827

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alexander Hogan

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-30hk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2828

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Hartney

General Comment

There should be no relaxation of laws and regulations around exporting or traveling with firearms. The United States has one of the worst rates of gun violence in the world and we should not allow that to flow over into other countries. Eased exports will only support terrorist organizations. Do not enable gun manufacturers to spread their business through terrorism.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945q-39kd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2829

Comment on DOS-2017-0046-0001

Submitter Information

Name: K. Worrell

General Comment

There are two major problems with this rule change moving the handling of export licenses of semiautomatic assault and other firearms from the U.S. State Department to the U.S. Commerce Department. First, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Second, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This rule change would, therefore, make it much easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous groups and organizations to obtain large caches of American guns and ammo with which to commit their horrendous crimes.

This rule change should not take place in the best interests of both American security and moral conscience.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-78dq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2830

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This would open up the sales of very dangerous weapons to other countries and i believe our security would be further degraded.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-sn71 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2831

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rhonda Johnson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-y14v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2832

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pat Anonymous

General Comment

I oppose the proposed rule for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-ixb5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2833

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jacalyn Kareb

General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945r-jrdz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2834

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Conroy

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted on line instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-w3nz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2835

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ryan DeRouen

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-kaat Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2836

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fabrizio Gabbiani

General Comment

I have the following concerns about the rule change. Specifically, it

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

None of these changes is beneficial to the broader public, in the US and abroad.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-3iwk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2837

Comment on DOS-2017-0046-0001

Submitter Information

Name: Zackery Ferguson

General Comment

I oppose this policy change for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals. Transfers the cost of processing licenses from gun manufacturers to taxpayers. Removes statutory license requirements for brokers, increasing risk of trafficking. Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. Reduces transparency and reporting on gun exports. Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-9dvj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2838

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer R

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-8m8c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2839

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Lindberg

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-mngi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2840

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anne Winn

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-kw8l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2841

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Smith

General Comment

I am concerned that the proposed export rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Please don't help make the world a more dangerous place so that weapons companies can make more money.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-fpx9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2842

Comment on DOS-2017-0046-0001

Submitter Information

Name: Arielle Franklin

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-z892 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2843

Comment on DOS-2017-0046-0001

Submitter Information

Name: Eugene Crook

General Comment

First, we should not be exporting anything to any country where it is currently against the law to own or possess such an item. This action would undermine that country's right to their own sovereign rule. Second, we have become the leading nation in the world in gun deaths, and we do not want to export that disease to any other country in the world. Third, exporting these items will create enemies and the US at this point needs friends, not new enemies.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945s-7t6p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2844

Comment on DOS-2017-0046-0001

Submitter Information

Name: Concerned American Mom

General Comment

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-6v0j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2845

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Austin

General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-yzot Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2846

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Reese

General Comment

This is stupid and only being pushed because the NRA has bought our politicians.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-la31 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2847

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andres Quiroga

General Comment

Good afternoon,

My name is Andres R. Quiroga, current resident of New York. Im writing to oppose this amendment based on the overwhelming amount of evidence we have on the horrific results American weapon exports have had around the world.

If moral grounds are not enough, please remember that we have directly armed terrorist organizations in the past, which resulted in loss of life of allies and American soldiers.

I know there are other plenty factually supported reasons not to, but human life has no cost, and those 2 should suffice.

Thank you

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-rucd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2848

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

As a human rights advocate for the last decade and a half, I am writing to express my concern about, and voice my opposition to, the reclassification of semi-automatic weapons as commercial items.

Due to my extensive work on gross human rights abuses in sub-Saharan Africa, I understand the role the semi-automatic weapons play in increasing fatalities in areas of Africa affected by conflict.

For example, in the Democratic Republic of Congo, the large-scale presence of automatic and semi-automatic weapons increases the toll on civilians at the hands of armed actors inside and outside of government. According to the 2012 Amnesty International Report, "If You Resist, We Will Shoot You!" (available online at http://www.amnesty.eu/content/assets/ATT_DRC_report.pdf), members of the Congolese Republican Guard used AK-47 rifles to disperse a crowd of pro-democracy demonstrators in the capital city of Kinshasa in late 2011.

The use of semi-automatic weapons like the AK-47 in the dispersal of protesters led to the death of 12 opposition activists as a result of this excessive force.

As such, I strenuously oppose the any federal steps to make these weapons easier to export across national borders.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-svsn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2849

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shauna Bona

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. Please note that I am a supporter of the Second Amendment and consider myself a rational moderate on the issue of guns. That being said, the proposed rule change eliminates necessary Congressional oversight for gun export, which stops an important check. I fear that we are placing the desires of the gun industry over the responsibilities of our Congressional leaders. I fear guns will proliferate and fall into the wrong hands. Mostly, I am disturbed that this action feels like it is taking place in secret, like so many changes lately, which seem to me to diminish the transparency and authority of the people to make wise, reasoned policy through their elected representatives. Please do not make this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945t-ev9c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2850

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Lucisano

General Comment

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-npu3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2851

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays in the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-320k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2852

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniel Ater

General Comment

No selling more arms of any kind outside the US!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-f5jo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2853

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jane Valentino

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-n7z5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2854

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shirley Brown

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-5be9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2855

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anon Diaz

General Comment

Unacceptable

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-iqgr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2856

Comment on DOS-2017-0046-0001

Submitter Information

Name: Victoria Pless

General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Other points include:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-pgtj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2857

Comment on DOS-2017-0046-0001

Submitter Information

Name: Crystal Colter

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-q2of Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2858

Comment on DOS-2017-0046-0001

Submitter Information

Name: B. Roxanne Taylor

General Comment

Please block the administration's proposed rule that would loosen laws on exporting military grade weapons which could then end up in the hands of criminals & terrorists. The rule would also allow 3D printing of dangerous weapons that may not be tracked by officials. This rule is deadly & weapons could then be used against US citizens. Act now to block it.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945u-j3bt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2859

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are by design highly portable danger. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Their lethality should be subject to more controls, not fewer.

Thank you for helping to secure our country and world as a safer place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-d5p6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2860

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ruth Harper

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-h5a6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2861

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristina Parks

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-obcd Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2862

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Bonistalli

General Comment

I oppose the proposed rule and urge you to abandon the proposal that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns,

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers and the gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-a75a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2863

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill Van Vlack

General Comment

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-uq1i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2864

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alicia McClintock

General Comment

My name is Alicia McClintock and

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that

firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. I hope this is taken seriously and not politicized.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-7sap Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2865

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945v-8190 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2866

Comment on DOS-2017-0046-0001

Submitter Information

Name: michael golen

General Comment

Opposed to these revisions.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-g5sa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2867

Comment on DOS-2017-0046-0001

Submitter Information

Name: Melanie Greene

General Comment

As a gun-owning taxpayer, I am very concerned about this proposed change in policy. I'm especially concerned that this change eliminates Congressional oversight for important gun export deals. It reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and eliminates registration of firearms exporters, a requirement since the 1940s.

The Commerce Department does not have the resources to enforce export controls, even now. It reduces transparency and reporting on gun exports. It transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. This does not seem to be in humanity's or our country's best interests.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-ql6j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2868

Comment on DOS-2017-0046-0001

Submitter Information

Name: Larry Little

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Please leave the regulation of firearm exports with the US State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-95id Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2869

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathy Bradley

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. International firearms sales must remain classified as "military" and therefore under regulation by the State Department, so that Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, or to countries where there are serious human rights concerns.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This would create an unacceptable proliferation of firearms in the hands of dangerous groups. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further, the rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Given the issues with gun violence and the trump Administration's attitude against immigration, this rule change would make two extremely bad situations much worse.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-s73g Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2870

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alfred Sils

General Comment

I oppose the ill considered move of the regulations regarding the export of firearms from the Department of State to the Department of Commerce. Firearms are an instrument of foreign policy rather than a commodity. Their export regulation therefore rightly belongs at State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-g5yj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2871

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robyn Alexander

General Comment

I vehemently oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

There is more than enough bloodshed and personal and community devastation in the United States from these ghastly weapons - please don't be responsible for spreading the worst of who America is to the rest of the world. Do the right thing and think of something besides profits.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-frhz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2872

Comment on DOS-2017-0046-0001

Submitter Information

Name: Holly Dowling

General Comment

I am strongly opposed to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is not in the best interests of the American public. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945w-2c39 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2873

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Nabors

General Comment

I oppose the proposal to move export licensing and oversight of assault and other powerful weapons from the Dept. of State to the Dept. of Commerce. The proposed rule would treat semiautomatic assault rifles as non-military, would eliminate congressional oversight for gun export deals, would transfer the cost of processing licenses from gun manufacturers to taxpayers, and would enable unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms.

The transfer of gun export licensing from the State Dept., which works to promote stability, conflict reduction and human rights, to the Commerce Dept., an agency with a mission to promote trade, is simply a bad idea.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-ev5m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2874

Comment on DOS-2017-0046-0001

Submitter Information

Name: Merica Hale

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-b8nf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2875

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Smith

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is too complex and driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Department's block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-oivp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2876

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Ungaro

General Comment

We need peace and US should Not produce and sell arms.
The government should ban all type of weapons,

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-hmog Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2877

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I believe that it's a mistake to change the sale of firearms to the Department of Commerce. This rule change will only come back to haunt us in a very horrible way. Just as increased firearms sales in this country haunt us. Please do not do this.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-76hr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2878

Comment on DOS-2017-0046-0001

Submitter Information

Name: vera gadman

General Comment

Ioppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is an insane idea that Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-945x-27gy
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2879

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda Wilcox

General Comment

My 19 year old daughter was killed in a rampage shooting in 2001, so I know full well the tragic toll of gun violence. I also know that Americas gun homicide rate is more than 25 times the average of other high-income countries.

An analysis of gun homicide rates in developed countries those considered high-income by the World Bank found that the United States accounted for 46 percent of the population but 82 percent of the gun deaths.

The current proposal by the Trump administration would it easier to export U.S. guns and ammunition globally. I strongly object to America arming the world, especially with assault weapons and other powerful firearms. The proposal would move export licenses from the State Department to the Commerce Department. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually.

I object to the proliferation of weapons used in war and crime in other countries. Specifically, I oppose the proposal for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

2. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue

Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

3. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

4. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

5. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Thank you for considering my objections and concerns. I ask that this proposal be rejected.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945x-a7j5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2880

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Trotter

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-6ikv Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2881

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dolly Howarth

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-jnus Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2882

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Ashton

General Comment

Semi-automatic weapons are NOT military weapons! Military units use fully-automatic (aka machine guns).

Don't listen to the morons!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-qpqz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2883

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Coleman

General Comment

I oppose moving oversight of gun sales from the Department of State to Commerce. This could very well come back to bite (kill) us. Some things are not worth profit. Please listen up on this. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945y-2ui3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2884

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Moderhack

Organization: Self

General Comment

Corporate profits from the sale of guns should never take priority over sensible gun laws and protection for the world's citizens. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Do not eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Do not remove licensing requirements for brokers, which increase the risk of trafficking. And do not remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Stand up for the safety of American citizens and citizens of the world. Do not switch the regulations of firearms export from the US State Department to the US Commerce Department. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-dtj8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2885

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stacy Germano

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-945z-qurh
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2886

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pam Magidson

General Comment

Thank you for the opportunity to comment on the Proposed Rule: International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III.

I am a citizen and taxpayer extremely concerned about gun violence and national security, and feel strongly that the handling of export licenses of semiautomatic assault weapons and other powerful firearms should remain with the U.S. State Department rather than move to the U.S. Commerce Department, for the following reasons:

This rule would transfer gun export licensing to an agency whose principle mission is to promote trade. Both assault weapons and non-semi-automatic weapons are used in large numbers by criminals around the world. Their export should continue to be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The proposed rule would transfer the cost of processing licenses from gun manufacturers to us, the taxpayers. Registration fees that are used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So, we the taxpayers will absorb the cost of reviewing applications and processing licenses when it should remain a cost that gun exporters pay.

The rule reduces end-use controls for gun exports in several ways. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would eliminate registration of firearms exporters, which allows the State Department to check on an exporters history. Without use of this database, enforcement against arms trafficking will be seriously weakened. The Commerce Department does not compile information on human rights violations, so this rule would make it harder to deny weapons licenses to international human rights violators

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. Furthermore, Congressional oversight for important gun export deals would be eliminated. Congress will no longer be automatically informed about sizable sales of these weapons. This would violate Congressional intent and effectively eliminate Congress proper role.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

What is perhaps scariest is that the proposed rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Please do not make it easier to export U.S. guns and ammunition globally by moving export licenses of semiautomatic assault weapons and other powerful firearms, given that U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in many nations. This seems to be a rule that would only benefit gun manufacturers, and that is just plain wrong.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-wwwsk Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2887

Comment on DOS-2017-0046-0001

Submitter Information

Name: Constance Anderson

General Comment

I want all guns to be regulated just like cars. All have to take a mental stability test and use of firearm tests. All need to be insured and close all the loop holes at gun shows. No one should sell a gun with out a paper trail. The data base will be paid for by gun owners through their fees and this data base is live, all law enforcement and courts should see complete history from every state. No more guns in public places or schools. End open carry, no one needs to take a gun to the movies or to concerts.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-v1y2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2888

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kristopher Anonymous

General Comment

I think this is a terrible idea.

The proposed rule would consider semi-auto assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Civilian trade does not need need assault rifles of any sort.

This rule removes Congressional oversight for important gun export deals, reduces transparency and reporting on gun exports (which increases the risk of trafficking along with the removal of of statutory license requirements), shifts the cost of processing licenses from gun manufacturers to taxpayers, gets rid of or decreases many existing gun control efforts, encourages 3D printing of firearms, and transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

It seems practically designed to make gun trafficking more likely, harder to control, and more of a problem than it already is without expanding the resources for any agency to combat all these clear downsides.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-7dd9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2889

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill Bailey

General Comment

Here are my concerns about the change to these policies:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-i76m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2890

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-wnm4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2891

Comment on DOS-2017-0046-0001

Submitter Information

Name: A.L. Steiner

General Comment

Treating semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries is unconscionable.

Do NOT:

- eliminate Congressional oversight for important gun export deals;
- transfer the cost of processing licenses from gun manufacturers to taxpayers;
- remove statutory license requirements for brokers, increasing risk of trafficking;
- reduce or eliminate end-use controls, such as State Depts Blue Lantern program, nor eliminate the registration of firearms exporters -- a requirement since the 1940s;
- enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms

As you know, the U.S. Commerce Department does not have the resources to enforce export controls, even now, so do NOT reduce transparency and reporting on gun exports. DO NOT transfer gun export licensing from an agency with mission to promote stability, conflict reduction and human rights, to an agency with mission to promote trade, for God's sake!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-yhe9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2892

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Canner

General Comment

Maintain control of International Traffic in Arms Regulations with the State Department where it resides currently.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

This change would make the world a far more dangerous place for these reasons:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-945z-9cwl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2893

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nicholas Holt

General Comment

Please do not allow the distribution of instructions for 3D printing of firearms. This would benefit only criminals and other dangerous individuals and groups. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-g7vs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2894

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ethan Rodriguez-Torrent

General Comment

Easing restrictions on the export of firearms -- including types already banned in several U.S. states -- does a disservice to the U.S. and the world. The United States is already the #1 exporter of small arms and light weapons, many of which end up in the hands of drug cartels and militias from Bogot to Jakarta. These transfers are documented in detail by wide-ranging research, including the Small Arms Survey and the U.N. Office for Disarmament Affairs. We will only be shooting ourselves in the foot (pun intended) if we choose to give gun manufacturers more freedom to contribute to instability abroad. We will also be repeating the same travesty our government has condoned for decades: putting firearm industry profits over human lives.

I urge the Department to reconsider this and any other relaxation of existing restrictions on small arms exports.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-ux4c Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2895

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Richardson

General Comment

I am submitting this comment in support of DOS-2017-0046 to remove many items from the USML and transfer them to regulation under Export Administration Regulations. It makes sense for American industry and it makes sense to allow the Dept of State to concentrate on regulating arms that are truly military in origin and impact.

Removing gunsmiths from the purview of ITAR is a good change.

Moreover, it will remove the State Department from the regulation of ideas such as the 3D printing instructions of Defense Distributed. That horse has left the barn years ago and further regulation will never get it back.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-z3m7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2896

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michelle Hanlon

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-j9p5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2897

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Bieszk

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-9yll Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2898

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joanne Gulsvig

General Comment

I oppose moving export license oversight for firearms from State Department to the Commerce Department. This proposed rule change eliminates necessary Congressional oversight for gun export deals, enables 3-D printing of firearms and passes on the cost of processing licenses to the US taxpayer.
BULLSHIT

No on this stupid rule. NRA can make more money some other way.

Sincerely,
Joanne Gulsvig

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-ro78 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2899

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

After reviewing the proposed regulations under the Federal Register for the revision of Category 1, we have noticed some irregularities in the overall objective of the transition.

Industry has been told that the shift from USML to CCL would be beneficial for the following reasons.

1. No export fees
2. Less Documentation For Exports of Commercial Type products

The issues, which are not clearly addressed in the Federal Register, are listed below.

In the proposal on Page 24198, titled Revision of Category 1, the FR indicates that items, which are inherently military will continue to be controlled under the USML. One could argue that inherently military can be applicable to any modern firearm depending on the End Use of the defense article. An End User in country X for example can use a commercial product for military applications regardless of original design and manufacture of the product. What will be the determination for the split between USML and CCL for an inherently military firearm?

Secondly, is Category I(G). I(G) will continue to cover many parts for commercial firearms such as Bolt Carriers, Slides, and Sear, which can be interchangeably used by commercial and military firearms. If a commercial customer wants to order a semi-automatic rifle and parts, such as replacement bolt carrier group or a upper receiver, barrel etc., then the applicant has to file an application with Commerce and State Department. This is a huge cost on industry and major cost to Commerce and the State Department. Right now the applicant could just file one application with State Department. The proposal would force applicants to get two different sets of documentation from the Consignee and then submit two applications. The cost associated to submit an application has now doubled since manpower is required to submit two licenses, and the cost to the US Government has increased since two applications now need to be reviewed by two different organizations. What about firearms such as Glock, Sig Sauer or Beretta etc.? Who will cover the parts since the United States military has used these products in the past? Will third party aftermarket accessories be considered as inherently Military parts and require a

State Department license?

DDTC has certain threshold guidelines for case processing times. What is the current, and projected processing times for Commerce to process applications? It is not uncommon for Commerce to staff out cases back to State Department for Referral further adding to the total time for processing. There is little to benefit industry if the average processing time for a case takes longer than current DDTC performance.

In addition, presently DDTC will RWA a case with explanation if there are certain factors contained within the case that may jeopardize national security interests. This allows industry to take corrective measures. What will be the RWA measure with Commerce? One major benefit of having a case RWA with explanation is the case officer has acted as a subject matter expert to accurately decide if a defense article contains features that will not be allowed for export to a certain country or individual. This safety net limits the liability of the applicant. When a case officer can act as a secondary set of eyes, it always is in the benefit of the applicant.

In the proposal on page 24200 under Regulatory Analysis and Notices there is little to indicate if Commerce will implement fees at a later date for applications of export. Although there will be a cost savings to the State Department what will be the cost implications to Commerce? How will Commerce accommodate the influx of applications without charging a fee to hire new personnel? Specifically, on page 24201 the Department of Commerce indicates it is unable to estimate the increase in costs. How will this impact case applications and timelines?

Perhaps, State Department could adopt a sliding fee structure for organizations that do not export or export very little. Under the proposal most manufacturers will still have to register with State Department.

In summation, as the proposal stands, there is blurred lines between inherently military items, many applicants will need to file two export licenses for parts and firearms with Commerce and State, increase in processing times, liability, and potential fees later on. We support changes in making the process more efficient, more effective and giving US Companies more advantageous positions to be competitive internationally. Many companies will benefit but many companies will also be significantly disadvantaged by the proposed changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9460-aakh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2900

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Lyman

General Comment

I am seriously concerned that any transfer of authority from the Department of State to the Commerce Department regarding the sale and shipping of any kind of firearms will bring a world of trouble to our country and to the rest of the world as well. The State Department has the resources and oversight to keep lethal weapons out of the hands of terrorists where the Commerce Department is all about supporting U S business without a keen focus on where the guns will go and what will they be used for. Our world is already awash in guns of all types and we don't need less oversight - we need much more. I would demand that the State Dept. should be given further powers to monitor overseas firearm sales. Commerce should be concerned with non lethal products and commodities and supporting our businesses who trade in products other than firearms.
NO to the transfer of authority from State to Commerce regarding fire arms sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-bfd9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2901

Comment on DOS-2017-0046-0001

Submitter Information

Name: Samuel Haller

General Comment

My friend and fellow citizen said it best:

"Easing restrictions on the export of firearms -- including types already banned in several U.S. states -- does a disservice to the U.S. and the world. The United States is already the #1 exporter of small arms and light weapons, many of which end up in the hands of drug cartels and militias from Bogot to Jakarta. These transfers are documented in detail by wide-ranging research, including the Small Arms Survey and the U.N. Office for Disarmament Affairs. We will only be shooting ourselves in the foot (pun intended) if we choose to give gun manufacturers more freedom to contribute to instability abroad. We will also be repeating the same travesty our government has condoned for decades: putting firearm industry profits over human lives.

I urge the Department to reconsider this and any other relaxation of existing restrictions on small arms exports."

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-jcyl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2902

Comment on DOS-2017-0046-0001

Submitter Information

Name: mary ellen masciale

General Comment

I do not support the changes to the rules for International Traffic in Arms Regulations.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-tocp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2903

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Armstrong

General Comment

Comments Re: Proposal for the United States to move oversight of export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department

I am a female senior citizen who, over a span of 76 years, has seen the sale and use of fire arms, especially assault-style weapons designed for military use, proliferate and the loss of life due to gun violence increase to a sickening and almost unimaginable level.

I vehemently oppose the proposal to move oversight of such weapons semi-automatic assault weapons, sniper rifles, and other powerful firearms not meant for use in hunting or other gun-related recreational sport, nor ever meant for self-defense from the State Department to the Commerce Department. Such weapons of war rightfully and logically belong under the purview of a military-oriented department. Further, removal of such weapons from the domain of the State Department is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. If this proposal is allowed to be enacted, Congress will no longer be automatically informed about sizable sales of these weapons, weakening controls on who ends up with such weapons even lifting restrictions on 3D printing of guns and inevitably leading to people making their own how powered weapons.

This proposal is really a sop to the gun industry and the NRA, aiding them in opening international markets and exporting U.S. guns and ammunition globally without regulation, and will likely lead to more U.S. guns ending up in the hands of criminal organizations, human rights abusers, and terrorist groups. It is a cynical move that wholly ignores the needs and rights of American citizens to live free of the fear of gun violence. It will take the country backward in the fight to reduce gun violence rather than move us forward in our efforts to promote and secure the safety of our citizens.

Further, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. The gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and

light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will also reduce transparency and reporting on gun exports. It would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

It is high time we stop kowtowing to the NRA and the gun lobby and start protecting our citizens rights to live free of fear of gun violence. I urge you in the strongest possible way to reject this proposal.

Ann H. Armstrong
Forest Park, Illinois 60130

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-83jg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2904

Comment on DOS-2017-0046-0001

Submitter Information

Name: Philip Koster

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-6bam Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2905

Comment on DOS-2017-0046-0001

Submitter Information

Name: Megan Kilb

General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-yy5m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2906

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christina Lachance

General Comment

Exporting weapons of war helps no one and causes unnecessary loss of human life. This practice must cease.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-my01 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2907

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura Klauke

General Comment

I am opposed to this proposed rule change. Instead, the Administration should consider other alternatives to better balance the important interests at stake.

Specifically:

I am opposed to the elimination of the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

I am opposed to the removal of licensing requirements for brokers because it will increase the risk of trafficking.

I am opposed to the removal of the State Departments block on the 3D printing of firearms. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-ehrf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2908

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jill Blumenthal

General Comment

I am concerned about the proposed changes. While I want our Second Amendment rights protected, I am also concerned that dangerous weapons don't get into the hands of the wrong people, which threatens public safety.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-jvm2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2909

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Pomerantz

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-r5mn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2910

Comment on DOS-2017-0046-0001

Submitter Information

Name: Russell Hartmann

General Comment

Hello, my name is Russell Hartmann. I am very concerned about gun violence in the world. Please do not make U.S. gun exports easier. I do not like that the administration is proposing to make it so transparency and reporting on gun exports. This whole rule is terrible. Please do not use it.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-1opx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2911

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Peterson

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-9ox5 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2912

Comment on DOS-2017-0046-0001

Submitter Information

Name: Erin Anonymous

General Comment

I live in Oregon and have advocated for gun laws enforcing safety requirements for the sake of those who want to live in a peaceful society. I disagree and disapprove of the transfer of licensing fees from gun manufacturers and I disapprove of guns leaving this country capable of being weapons of war and going to other countries where they could harm civilians. We are a country which still struggles to treat women as equal to men, and whose violent crimes are largely committed by men, possibly due to a prevailing worldview where men are the center of that world view. And so it is illogical to me to hear people declare this country the greatest country in the world and then permit weapons of war to leave our country and go to other countries where the oppression of women or minority groups might be even worse or more unpredictable. We have a moral obligation to not let destructive weapons leave our control as a country because we have not yet reached equality nor perfection in social behavior or control, and even if we say we have no morals to account ourselves to we still have the inescapable desire to call ourselves the greatest nation on earth. And that would be a lie if we did not protect others from the very failings, or worse, we ourselves have. Transferring fees from businesses who make a tool of death is only putting in 'bronze' the pervasive man centered world view as if it is here to stay and will never be lifted up from up off of the people. If the companies want to make a tool of death let them pay the associated costs. They should not be allowed to use other people to bear their responsibilities.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-nqco Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2913

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-rwjz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2914

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sally Martinelli

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-cd6n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2915

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pauline Higgins

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This rule change transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-9462-bau7
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2916

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christopher Lish

General Comment

Sunday, July 8, 2018

Subject: Do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department -- International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III (Docket ID: DOS-2017-0046-0001)

To: Secretary of State Mike Pompeo, Secretary of Commerce Wilbur Ross, Under Secretary of Commerce for Industry and Security Eric L. Hirschhorn, and Assistant Secretary for Export Administration Richard E. Ashooh,

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you are aware, firearms exports are currently classified as "military and are under the jurisdiction of the State Department. Congress can also block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines, Saudi Arabia, and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have sufficient staff, let alone staff in every nation around the world. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would also make the world a far more dangerous place because:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.

3) It would remove the State Departments block on the 3-D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3-D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3-D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3-D printing of firearms in the U.S. and around the globe.

I strongly urge you to reject this proposed rule change.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-6b7x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2917

Comment on DOS-2017-0046-0001

Submitter Information

Name: Johanna McConnell

General Comment

I am strongly against letting US gun manufacturers sell weapons abroad. Those guns will be purchased by criminal gangs and used against law enforcement and US soldiers. Selling US guns abroad is being promoted by Trump so the NRA and gun manufacturers will support Trump and give him money to support his campaign in 2020.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-geue Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2918

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Watts

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-1yqn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2919

Comment on DOS-2017-0046-0001

Submitter Information

Name: Meggin Lane

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake. I would like our legacy, as the United States of America, to be that we made the world a safer place to live rather than create an increase in the level of violence in which the world is already dealing.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-n9io Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2920

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tracy Feldman

General Comment

I am a parent and educator in Durham, NC. I am strongly against the new rule being considered about deregulating gun exports. This would make our world more dangerous in many ways:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-lwbd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2921

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Coyle

General Comment

I believe the changes proposed would make gun trade too open and unregulated, endangering not only U.S. Citizens but countries receiving more guns as a result.

Sincerely,
John B. Coyle, M.S. Ed

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-hy0a Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2922

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynn Gravelle

General Comment

I oppose the rules change that would move the handling of export licenses of powerful firearms from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the experience and resources to adequately enforce export control. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-26k6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2923

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carita Weaver

General Comment

I am against this because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9462-agln Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2924

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Branch

General Comment

I am completely opposed to the proposed rule change. This proposed rule change seems extremely ill conceived. We have so many problems with guns in our country. Why do we want to make things more difficult for the US and the world in relationship to arms?

It will do the following if passed:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-otxw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2925

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Olinger

General Comment

I am writing to express my vehement opposition to moving export license oversight for firearms from the U.S. Department of State to the U.S. Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is clearly inconsistent with the undeniable reality that our troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

Our government should not be making it easier to trade/export weapons that are likely to be used in other countries by organized crime, terrorism, human rights violations, and political violence. It is inappropriate and shameful that the proposal would, in effect, use the Commerce Department to promote trade in such weapons to kill human beings abroad. Abroad, our country already has the reputation as being overrun with guns; so our solution is to make it easier to export these weapons? The current gun export licensing oversight under the State Department is appropriate as that agency's mission is promoting stability, conflict reduction, and human rights.

In addition to reducing transparency and reporting on gun exports, the proposed rule also would: eliminate Congressional oversight for important gun export deals; transfer the cost of processing licenses from gun manufacturers to taxpayers; and, enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Shameful.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-g53x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2926

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Lenkowski

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

The last thing we need to export is America's love of guns and the devastating slaughter that results from that love affair!

Leave firearms export license oversight in the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-rd7v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2927

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janiece Staton Ret. RN, MSW, MAT

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-wpkm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2928

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Coffee

General Comment

This proposed rule is irresponsible because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-jqvs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2929

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shirley Rombough

General Comment

I oppose the regulation that would remove the exporting of firearms from the U.S. State Department to the Department of Commerce.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-Inrm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2930

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Lusch

General Comment

I'm against making it easier to export firearms to other countries. In most cases they will be used to do bad things. Why support something like this? The arms manufactureres just want to make more money.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-oprc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2931

Comment on DOS-2017-0046-0001

Submitter Information

Name: Melissa Henriksen

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-196u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2932

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Bellm

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-o528 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2933

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cara Artman

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-toej Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2934

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kelly Alba

General Comment

Please consider the following negative aspects:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-rfls Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2935

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margret Harburg

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-d5ns Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2936

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

It should be illegal to import or export firearms from other countries.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-6hlx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2937

Comment on DOS-2017-0046-0001

Submitter Information

Name: Enid Cardinal

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please take all this into consideration before you would take the extremely dangerous step.

Thank you.

Enid Cardinal

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-w16d Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2938

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am not in agreement with the proposed changes to the International Traffic in Arms Regulations. Intending to revise these three categories indicates a commercial pursuit not considering the deadly impact it could have on recipient countries. Widening this market with a more diverse selection will spur more international trade with international armies and polices infamously recognized for their human right repression.

I fear this will allow the United States Department of State to give clearance to gun shops across the South West to offer a wider selection for our governments and armies south of the border. I fear for that for the pursuit of commercial growth, unworthy and untrusting armed forces across the world will have access to this deregulating market.

The Federal Register of Munitions should be more mindful of who their customer base is, on an international level, and spend more time investigating the international trafficking of arms. It is no coincidence that Border Patrol Agent Brian Terry was killed with a gun supposedly monitored by the ATF's Fast and Furious Operation.

I understand the economic concerns some gun shop owners and employees and the industry as a whole may have, but the potential for US-manufactured, commercially-approved, gun-fueled violence in the world should not be overlooked due to the loss of some revenue.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9463-gnz1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2939

Comment on DOS-2017-0046-0001

Submitter Information

Name: Deborah McArthur

General Comment

I am a concerned citizen who worries that easing the export of arms internationally will facilitate the weapons ending up in the hands of terrorists. Haven't we been down this road before with the Iran-Contra scandal?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-io9b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2940

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gabriel C

General Comment

As an entrepreneur and skilled maker who is capable of creating performance parts and custom sporting firearms for use in shooting competitions, I am unable to enter this market without significant financial backing. I cannot create a hammer, trigger sear, disconnector, any part. I cannot tune and improve handguns and sell them as signature upgraded firearms. Not unless I register with the DDTC, and stay registered with them annually at a great expense for a one-man show.

I support the elimination of the annual \$2,250 fee required by the Department of States Directorate of Defense Trade Control. I believe this imposed requirement was done to choke innovation and advancement in the firearms industry.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-2gp7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2941

Comment on DOS-2017-0046-0001

Submitter Information

Name: Paul Cardinet

General Comment

Do not make it easier to export firearms or ammunition.

Make the rules stricter and harder. We do not need to export these weapons and ammunition.

In the long run firearm exportation only make the world amore dangerous place

Paul Cardinet

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-ncqs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2942

Comment on DOS-2017-0046-0001

Submitter Information

Name: D. Foster

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Semiautomatic assault weapons and other powerful firearms are clearly military and as such must continue to be under the regulation of the State Department and to allow Congress the ability to block sales of large batches of firearms to foreign countries in the name of national security, and to countries where there are serious human rights concerns. The Commerce Department just does not have the resources to adequately enforce export controls; firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The rule change would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe, which is a terrible idea. This rule change would make both the US and the world a far more dangerous place.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-lp8s Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2943

Comment on DOS-2017-0046-0001

Submitter Information

Name: Caroline Todd

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military and therefore are under the regulation of the State Department, and thus Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Come on -- it is obvious our national security implicated. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world as this is how they make money. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-mm2t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2944

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-nao6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2945

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hannah Berg

General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the U.S. Commerce Department because I believe that leaving this responsibility to the U.S. State Department maintains the safety of Americans, as opposed to the best interests of corporations and their shareholders.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-hd4p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2946

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robb Fisher

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military and therefore are under the regulation of the State Department, and thus Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Come on -- it is obvious our national security implicated. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world as this is how they make money. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9464-mesz Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2947

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Simpson

Organization: Retired

General Comment

This proposal would inevitably lead to many more deaths, suffering and subjugation of innocent citizens. Please do not endorse this proposal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9465-ae66 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2948

Comment on DOS-2017-0046-0001

Submitter Information

Name: Josh Silverstein

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Sincerely,
Josh Silverstein
Brooklyn, NY

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9465-ejua Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2949

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patti Gorman

General Comment

I oppose the regulation change that would put firearms under the Department of Commerce instead of the Department of Defense. The ramifications are very serious and dangerous.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9466-9s51 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2950

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Knutson

General Comment

Please retain overview and potential restrictions on international gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9466-6ae2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2951

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lama R

General Comment

I oppose this rule change. I believe the US State Department should continue to have control over foreign arms sales. This could otherwise become dangerous especially if weapons get into the wrong hands. Gun sales to foreign entities should remain as military sales that are carefully controlled by the US State Department. Otherwise, this could become a major security risk for our nation. The US Commerce Department is focused on promoting American business. This is not about American business. This is about American safety. The US State Department is focused on safeguarding our nation. It is the right entity to continue having control over foreign arms sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9466-ldl9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2952

Comment on DOS-2017-0046-0001

Submitter Information

Name: Gary Simmons

General Comment

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

I oppose the proposed rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9467-dsw1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2953

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mariela Acevedo

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9468-c2ri Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2954

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrew Walcher

General Comment

I am writing to oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Firearms are a weapon of war and tight restrictions should be maintained on which foreign entities can have access to these.

The current rules automatically informing Congress about sizable weapons sales is critical to keep military-grade hardware from falling into the hands of regimes which pose serious human rights concerns towards their people, or those which would pass these weapons along to terrorist organizations.

The Commerce Department does not have the resources to adequately enforce export controls as its Bureau of Industry and Security does not have staff everywhere. This means we will be relying on the same industry self-regulation which has produced the disastrous US domestic firearms policy. In short, profit will be placed over national security.

While not perfect, the State Departments Blue Lantern program is a much better alternative to this giveaway to the gun industry.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9469-vj3z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2955

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Blackley

General Comment

Why make gun sales easier to potential terrorists?

Are three D guns easier to slip onto airplanes?

Why loosen regulations on guns shipments and sale?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9469-cxwh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2956

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Smith

General Comment

The Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946a-damm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2957

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Freeland

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946a-2gg0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2958

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carolyn Belczyk

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946a-n1mc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2959

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Zitzmann

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946b-sih8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2960

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946b-l510 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2961

Comment on DOS-2017-0046-0001

Submitter Information

Name: richard kunkel

Organization: nobody

General Comment

I am against this legislation, as it will just make more guns more accessible. Not common sense, not common, not even sense.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946b-i4zj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2962

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janice Valder

General Comment

Please do not pass this in my name. When we the taxpayers are having to pay 4 decreased regulation of semi-automatic weapons and guns it is making me responsible for how they are used to kill each other and to kill us. We are already killing our own with weapons made and sold by our gun manufacturers. I ask you in the Department of State to become peacemakers not war makers.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946c-xy29 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2963

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debra Chisholm

General Comment

Dear Sir/Madam:

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Sincerely,
Debra Chisholm

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946c-5077 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2964

Comment on DOS-2017-0046-0001

Submitter Information

Name: Martha Hill

General Comment

I am a retired person concerned about the cost shift that will happen with these changes. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946c-bws2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2965

Comment on DOS-2017-0046-0001

Submitter Information

Name: Victoria Chance

General Comment

My name is Victoria Chance from Greenville, SC. I oppose this proposed rule. As a Franciscan and a citizen, we should not export semi-automatic weapons. These firearms should be dismantled and recycled. Congress needs to maintain oversight over ALL guns sales. Exporters should pay for licenses. We should never remove the block on printing 3-D firearms.

We are all responsible for the safety of one another. Passing this proposed rule would simply jeopardize the rest the world as we export our propensity for violence for the sake of money. Profit is not a justification for increasing the violence in the world. Our government should be exporting humanitarian aid, education, and our justice system NOT weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-78n3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2966

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Cooper

General Comment

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. I am afraid of the use of assault rifles by non-military troops such as guerillas.

Eliminates Congressional oversight for important gun export deals. Congressional oversight is essential.

Transfers the cost of processing licenses from gun manufacturers to taxpayers. We taxpayers do not want to pay the cost of processing gun licenses.

Removes statutory license requirements for brokers, increasing risk of trafficking. This point suggests a complete lack of control over who will ultimately receive and use the weapons we transport. This is very dangerous.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade. This is a very good point. Guns are weapons of war and killing and should be used only as necessary in order to promote peace.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-7381 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2967

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura M

General Comment

I am a teacher within the Chicago Public Schools district. I am opposed to amending the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

The firearms industry is hurting financially - revising these rules to benefit the fire arms industry's bottom line is NOT in the best interest of Americans or any global citizens.

We do not need more guns in the hands of those that wish to cause us harm. These high powered weapons belong in the hands of our military and not civilians.

Also, the amendments proposed would limit Congressional oversight on important gun export deals and drastically increases the possibility for gun trafficking. This is unacceptable.

I respectfully ask that the Department of State does not amend the International Traffic in Arms Regulations (ITAR).

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-imzp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2968

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tucker Respass

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department vigorously oppose the rule changes that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Such trade must be factored into international interactions and diplomacy. It is not simply a matter of commerce. Further, the proposals to cease licensing would make arms too easily trafficked, especially without at least as much inspection as has been conducted with State Department oversight. And there should never be 3D reproduction of guns of any size of fire-power.

Tucker Respass

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-qgxs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2969

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-n52u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2970

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Johnson

General Comment

Please stop these sales of weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-58xc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2971

Comment on DOS-2017-0046-0001

Submitter Information

Name: Pamela Albers

General Comment

I am a 60 year old American citizen who is sickened by the unnecessary violence perpetuated by the availability of weapons.

I am opposed to the proposed rule change for the following reasons:

The proposed rule change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

The proposed rules are bad policy and encourage bad conduct.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-5x6b Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2972

Comment on DOS-2017-0046-0001

Submitter Information

Name: Renee Fitzpatrick

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-9n9r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2973

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mikaela Moracco-Schelp

General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Furthermore, it would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-v2sa Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2974

Comment on DOS-2017-0046-0001

Submitter Information

Name: JL Angell

General Comment

I oppose the proposed rule as explained in the attached.

Attachments

I oppose the proposed rule for the following reasons

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. [2] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42> Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government - i.e., taxpayers - will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention. [3] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S.

Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] <<http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eld=2af87259-df55-4a4a-bd29-35ea1d658f42>> The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency - the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5]

<http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> The export of these weapons should be subject to more controls, not less.

[1] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III [DOS_FRDOC_0001-4527, Docket No. Docket DOS-2017-0046] and Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) [83 FR 24166, Docket No. 111227796-5786-01].

[2] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> “US lawmakers balk at arms sales to Saudi Arabia, Turkey and Nigeria,” *DefenseNews*, Sept. 26, 2017, <https://www.defensenews.com/congress/2017/09/26/us-lawmakers-balk-at-arms-sales-to-saudi-arabia-turkey-and-nigeria/>

[3] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> “Arms Dealer Faces New Charges,” *New York Times*, Aug. 23, 2010, <https://www.nytimes.com/2010/08/24/us/24arms.html>

[4] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf>

[5] <http://www.vpc.org/the-trump-administration-proposes-making-gun-exports-easier-heres-how-to-submit-your-public-comment-on-this-dangerous-proposal/?eType=EmailBlastContent&eId=2af87259-df55-4a4a-bd29-35ea1d658f42>> Ongoing resource on “Cross Border Gun Trafficking: An Ongoing Analysis of the Types of Firearms Illegally Trafficked from the United States to Mexico and Other Latin American and Caribbean Countries as Revealed in U.S. Court Documents,” by the Violence Policy Center, <http://www.vpc.org/indicted/>

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-wbd4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2975

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Mitkus

General Comment

I OPPOSE this rule change. The proposed rule would dramatically change the regulatory structure for firearm exports. Further, the proposed rule is being driven by the interests of the gun industry.

I am concerned that the proposed rule will not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

The rule change would make the world a far more dangerous place in the following ways:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Rather than moving forward with the proposed rule, the Administration should SCRAP this rule and consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946d-396k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2976

Comment on DOS-2017-0046-0001

Submitter Information

Name: Victoria Ross

Organization: WNY Peace Center

General Comment

This would be a terrible scourge on the world, with the only beneficiaries the Merchants of Death - I mean arms manufacturers. The United States cannot, must not allow this avenue that can flood the world with military-grade arms. If you have any conscience at all, please do not allow this to happen. The many lives that would be lost would be on your head. Please do the responsible thing and block this proposal!! Our communities our nation and our world will thank you for it

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946e-2n2p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2977

Comment on DOS-2017-0046-0001

Submitter Information

Name: Douglas Bohling

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946e-8wlm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2978

Comment on DOS-2017-0046-0001

Submitter Information

Name: karyn barry

General Comment

The US should not be trafficking in weapons. We have fueled too much bloodshed, suffering and wars around the Globe. How about exporting peace?!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946e-te0x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2979

Comment on DOS-2017-0046-0001

Submitter Information

Name: William Walls

General Comment

To whom it may concern:

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports to Commerce would facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and exacerbates the worldwide refugee crisis.

William J. Walls

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-lvuk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2980

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Barrineau

General Comment

The proposed gun rule change would benefit the NRA while making the world a far more dangerous place for the rest of us.

By eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; removing licensing requirements for brokers, increasing the risk of trafficking; and removing the State Departments block on the 3D printing of firearms.

Please protect us. Protect the rest of the world, too. Thank you. I vote!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-q7fv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2981

Comment on DOS-2017-0046-0001

Submitter Information

Name: Noella Poinsette

General Comment

We should not be exporting more guns especially guns of the same type that our military uses and the licensing should not be transferred to an agency the Commerce Department that already cannot fulfill its responsibilities. Licensing needs to stay with the State Department which is more focused on the harm that these weapons do to our citizens abroad and citizens of other countries.

A 2nd reason I am strongly opposed to these proposed changes is that congressional oversight would effectively be eliminated. This is extremely important because without such oversight nobody would have been aware of the scope of recent human rights violations in the Philippines or in Turkey.

We as a country need to continue to stand up for the dignity of each person - a dignity that is far more important than a few people or companies making money off of an increase in violence and killing.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-609q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2982

Comment on DOS-2017-0046-0001

Submitter Information

Name: Katharine Tussing

General Comment

Please do not transfer the regulation of firearms export from the Department of State to the Department of Commerce. That would facilitate even more warfare around the world and firearm exports to oppressive regimes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-wugm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2983

Comment on DOS-2017-0046-0001

Submitter Information

Name: Theresa Turner

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Theresa Turner
Spring Lake, NJ

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-49zh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2984

Comment on DOS-2017-0046-0001

Submitter Information

Name: Colleen Scanlon

Organization: Catholic Health Initiatives

General Comment

See attached letter.

Attachments

CHI_Overseas gun sales_final



Imagine better health.™

198 Inverness Drive West
Englewood, CO 80112

P 303.298.9100
catholichealthinitiatives.org

Submitted via regulations.gov

July 9, 2018

Wilbur Ross
Secretary
Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
1401 Constitution Avenue NW
Washington, DC 20230

Mike Pompeo
Secretary
Office of Defense Trade Controls Policy
Directorate of Defense Trade Controls
U.S. Department of State
2201 C Street NW
Washington, D.C. 20520

RE: RIN 0694-AF47 (Commerce) and RIN 1400-AE30 (State)

Dear Mr. Ross and Mr. Pompeo,

Catholic Health Initiatives appreciates the opportunity to comment on the proposed rules to address the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). Catholic Health Initiatives (CHI) is a faith-based nonprofit health system operating in 18 states with 100 hospitals and numerous other services and facilities that span the inpatient and outpatient continuum of care. As a Catholic organization, we feel a special call to reduce violence in our communities and around the world.

While these proposed rule touches many aspects of firearm regulation, sales and oversight, CHI is particularly concerned about the transfer of weapon sale regulation from the State Department to the Commerce Department and the negative effect this may have on violence around the world. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Catholic Health Initiatives

July 9, 2018

Rather, the rule proposes to transfer gun export licensing to the Commerce Department, whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The types of weapons being transferred to Commerce Department control—including the AR-15, AK-47, and other military-style assault rifles and their ammunition—are among the deadliest personal-use weapons produced in the United States. We also understand they are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

We should not export American violence solely to boost economic development, competitive advantage, or other commerce-related goals. We strongly urge the Departments of Commerce and State to rescind this proposed rule.

Thank you for consideration of our comments on this important issue. If you have any questions, please contact me at 303-298-9100 or contact Laura Krausa, Director of Advocacy, at laurakrausa@catholichealth.net.

Sincerely,

A handwritten signature in cursive script, appearing to read "Colleen Scanlon".

Colleen Scanlon, RN, JD
Senior Vice President and Chief Advocacy Officer

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-6k66 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2985

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The US arms makers are a major source of small arms originally designed for and supplied to our military. Since 1970 or so they have hit the civilian market in vast numbers, and we are seeing the totally expected abuse with mass shootings in the US. Really, do we want more of the same with these same guns in the hands of foreign gangsters, despotic governments, terrorists, etc.,etc? The NRA's only concern is to sell as many guns as possible, not only here, but across the world. Isn't there anyone in our government. who has the courage to push back on this insanity? Please do. Peter eyonmark

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-v4kk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2986

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill Durston

General Comment

Americans Against Gun Violence opposes the transfer of oversight for regulation of firearms exports from the State Department to the Commerce Department, as proposed by the Trump Administration in the ITAR amendment, categories I, II, and III. The new proposed changes would have numerous adverse effects, including, but not limited to, the following:

Reclassifies semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime,

political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

The ITAR amendments proposed by the Trump Administration are clearly an effort to boost lagging domestic gun sales without regard to the safety of civilians in other countries. The epidemic of gun violence in the United States is a national disgrace. We should not be in the business of exporting this epidemic abroad.

Yours truly,

Bill Durston, MD

President, Americans Against Gun Violence
(916) 668-4160 / (888) 286-8122

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-j7ng Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2987

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandy Commons

General Comment

I am opposed to the transfer of firearms regulation from the State Department to the Commerce Department. It would open far too many opportunities for terrorists to get their hands on weapons we produce so as to use them against us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-2iao Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2988

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kellyanne Bondulich

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-zl02 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2989

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Schneegurt

General Comment

I am a registered Republican from Kansas and I always vote. I stand with the students from Parkland and want to limit gun violence with common sense laws and regulations. Let's not follow the bad practices of Ollie North (the criminal) head of NRA.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military.

The proposed rule would eliminate Congressional oversight for important gun export deals.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons.

The rule reduces end-use controls for gun exports.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.

The proposed change will reduce transparency and reporting on gun exports.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-4plm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2990

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Larson

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-i2ai Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2991

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Are you kidding me? Will shameless greed at the expense of the lives of God's children never end under Republican rule? How much is enough? Make money but honor God's children. What if you were at the receiving end of these weapons' aim? "What profit a man if he gain the world but lose his soul?". I pray your hearts and minds be opened to truth. I pray for your well being.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946f-j92p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2992

Comment on DOS-2017-0046-0001

Submitter Information

Name: E Smith

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-xsq2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2993

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hollye Dexter

General Comment

My name is Hollye Dexter. I am on the board of directors for Women Against Gun Violence and have experienced the scourge of gun violence in my own family. I vehemently oppose the transfer of oversight of firearms export from the state to commerce department. Guns kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less. Incidentally, did anyone consider that arming criminals and terrorists in third world countries will only send more asylum seekers fleeing to our borders?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-hbd0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2994

Comment on DOS-2017-0046-0001

Submitter Information

Name: Alice Dahle

Organization: Amnesty International USA

General Comment

For thirty-five years I have been a member of Amnesty International USA and currently chair our Women's Human Rights Coordination Group. Amnesty International is the world's largest grassroots human rights organization, and our global movement consists of millions of members and activists who defend justice, dignity and freedom for everyone without exception. The Women's Human Rights Coordination Group's particular area of interest is in the human rights of women and girls.

We are concerned about recent proposals to move responsibility for oversight of licensing of international sales of some small arms and light weapons from the Department of State to the Department of Commerce and the removal from the US Munitions List (USML) of several semi-automatic firearms, including AR-15s, some AK-47s and high capacity ammunition cartridges. Since 2014, the U.S. has been one of the worlds largest arms dealers, and is responsible for approximately 30 percent of conventional arms transfers with regards to monetary value. Consequently, these changes would make sales of these weapons easier and expand access to them at their destination. They would also reduce accountability for their use in commission of human rights abuses.

It is now recognized that rape and sexual assault are systematically used as weapons of war in conflicts around the world. Attacks on women and girls terrorize families, communities or ethnic groups, humiliating and demoralizing local residents to bring them under control, or causing them to flee from disputed territory

In interviews with women and girls who have survived sexual violence during conflict, a very high number of their stories include descriptions of the torture they endured at the point of a gun. Although the particular models of firearms involved are seldom identified, there is no doubt that a military-style weapon contributed to gross violations of their human rights. Even after a conflict has officially ended, the weapons left behind are used all too often by perpetrators of domestic violence. Colombia receives a large proportion of their weapons from the U.S. These guns are often linked to the patriarchal culture that supports the notion that firearms help men to defend themselves and protect their families. However, these weapons exacerbate violence against women and girls. In Colombia, 2 out of 10 women who are

internally displaced identify sexual violence as the primary cause. The exact model of firearm used in violence against women and girls is irrelevant, and all military-style weapons and ammunition currently on the US Munitions List should remain there.

Amnesty International was actively involved for two decades in negotiating the global Arms Trade Treaty (ATT), which went into force in December 2014. This treaty requires that before authorizing a transnational sale of firearms, governments must assess the risk that the weapons under consideration would be used to commit or facilitate serious violations of international humanitarian or human rights law, undermine peace and security, or to engage in transnational organized crime. An "overriding" risk that the arms would be used for these purposes would prohibit the sale.

After intense lobbying by women's human rights organizations and activists during the drafting of the ATT, it became the first treaty that recognized the link between the international arms trade and gender-based violence. Article 7(4) of the treaty made it mandatory for arms exporting countries to assess the risk that weapons being considered for sale would be used to commit or facilitate gender-based violence and deny authorization in the case of an "overriding" risk.

Moving responsibility for authorizing international sales of additional weapons and ammunition from the Department of State to the Department of Commerce would bypass the requirement to assess the risk that the merchandise in question would be used to commit or facilitate human rights violations, including gender-based violence. It is essential that these standards continue to be upheld, and we strongly urge the Government to maintain responsibility for international sales of weapons and ammunition manufactured in the US with the Department of State.

Sincerely,

Alice Dahle, Chair
Women's Human Rights Coordination Group
Amnesty International USA

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-ilg4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2995

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Iannucci

General Comment

I am writing to express my opposition to the proposed rule regarding the regulation of international arms traffic. The rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-gknn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2996

Comment on DOS-2017-0046-0001

Submitter Information

Name: Tammy Kreznar

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-2jx2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2997

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lynda Stewart

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-53bv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2998

Comment on DOS-2017-0046-0001

Submitter Information

Name: Karole Friemann

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

Please review this legislation and guarantee that it does not allow guns to be sold to terrorists in other countries or those who will use them against the United States and its citizens. It is time to run this country in the best interest of our citizens and the citizens of the world!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-eong Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-2999

Comment on DOS-2017-0046-0001

Submitter Information

Name: stephen canner

General Comment

keep it with state department

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-o3qo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3000

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Hall

General Comment

I oppose the regulation of firearms exports by the Department of Commerce rather than the Department of State. The former department is already overburdened while State has the resources to continue this job. America must not become the gun dealer to the world and make worse the proliferation of weapons, especially weapons that will find their way back to our streets.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-vtec Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3001

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margo Chesley

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-w5qi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3002

Comment on DOS-2017-0046-0001

Submitter Information

Name: Al Lindsey, M.D.

General Comment

Please do not allow the supervision of Firearms Exporters to be transferred from State to Commerce. This is bad policy on too many fronts to include, and it is another gift to the gun lobby, which has received too many gifts from this failed and illegitimate administration already.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946g-u859 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3003

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sreevalli Chivukula

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946g-ppvj
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3004

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kate Kizer

General Comment

I'm an expert on civilian harm and the arms trade, and I write to urge you to reject this dangerous proposal because:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, and US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate arms exports.
2. The proposed rule would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, which will limit its ability to comment on related human rights concerns. Items moved to Commerce control would no longer be subject to the statutory required congressional notification for sales of firearms regulated by the US Munitions List valued at \$1 million or more. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing, leaving the government i.e. taxpayers to absorb the cost of reviewing applications and processing licenses.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

5. The rule reduces end-use controls for gun exports. It would eliminate the States Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. End-use controls also are weakened by eliminating registration of firearms exporters. Registration of exporters allows State to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transferring licensing to Commerce will remove new exporters and brokers of these firearms from State's database, weakening enforcement.

6. The rule enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the US and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, State has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance the Commerce does not.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-tc52 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3005

Comment on DOS-2017-0046-0001

Submitter Information

Name: William M. Musser IV

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-o6ts Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3006

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christy Milam

General Comment

I oppose the the Trump administration proposal to move the make it easier to export U.S. guns and ammunition globally. By transferring the authority from the State Department to the Commerce Department, the number of exports applicant will increase by 10,000 annually. This includes assault weapons and other powerful firearms! This change in policy is problematic because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-fafh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3007

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jacob Gurvis

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-rb8h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3008

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Yamada

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I urge rejecting this change. The United States shouldnt be exporting death weapons without careful deliberations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-55ft Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3009

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nicole Clarke

General Comment

I oppose the proposed rule, as it loosens the regulation of gun exports and increases the risk that military-style weapons land in the hands of international criminals. The proposed rule dramatically changes the regulatory structure for firearm exports and appears largely driven by the interests of the firearms industry. Notably, the proposed rule decreases transparency to Congress and the public. I urge you to reject the proposed rule as currently drafted.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-v7qq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3010

Comment on DOS-2017-0046-0001

Submitter Information

Name: Willliam Marsh

General Comment

I am opposed to the transfer of oversight of firearms exports from the State Department to the Commerce Department. Firearms are weapons of war. The State Department is tasked with relations with other countries and the reduction of violent conflict in the world. On the other hand the Commerce Department would be responsible for increasing the sale of such weapons in support of US arms manufacturers. The Commerce Department has no responsibility to determine the effect of a particular arms sale on the stability of a country or region.

The State Department is in a position to know the political ramifications of shipping weapons of war to any particular country or region, and therefore should be in charge regulating the sale of such weapons of war. The sale of such weapons should remain under control of the United States Munitions List (USML) .

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-bdd8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3011

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amanda Smock

General Comment

Right now, firearms exports are classified as military. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. The Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-5ta2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3012

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

The proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so that public may understand the impact of these rules and potential firearm exports. Also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-wy44 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3013

Comment on DOS-2017-0046-0001

Submitter Information

Name: Daniale Lynch

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

When will the safety of our children and the members of our communities become more important than the profits of the gun industry?

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-lj5w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3014

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-85bb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3015

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ben Musser

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-eqto Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3016

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Berkwitz

General Comment

Regrettably, on May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of the gun industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms, which could lead to great bloodshed in other countries. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-hi13 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3017

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Lane

General Comment

I oppose this, or any other, rule change that would move the regulations of firearms export from the State Department to any other agency. That change would encourage firearms sales to entities that we all agree should not have them, such as oppressive political regimes, criminals and terrorists in other countries. The resulting increase in violence would not only destabilize those countries, but encourage mass migration to the United States, both undesirable outcomes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-x221 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3018

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Kelcey

General Comment

I am in opposition to this rule change. Congress needs to control arms sales through the state department not the business department. Weapons or arms sales should be controlled in the interests of the entire country not just a businesses need to improvethetbottom line.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-p8ce Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3019

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lori Van Orden

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

brokers of these weapons to register and obtain a license, increasing the risk of trafficking. [3]

The rule would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4]. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-13b7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3020

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-958y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3021

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kamella Tate

General Comment

I come from many generations of responsible rural gun owners. There are times and places where gun ownership and use are critical; however, I find the proposal to ease restrictions on the exportation of guns and ammunition from the United States to be abhorrent. We struggle enough with gun violence in our own country, that the gun industry and the NRA are pushing to embed that struggle in other communities just to increase sales and profits is poisonous and amounts to nothing more than greed run amuck. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-3kaq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3022

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dennis Gormley

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946h-afut Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3023

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Fishback

General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-3bsg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3024

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sherry Blanton

General Comment

Please do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are not just merchandise made and sold to profit businesses; they are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-fy6p Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3025

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maureen Brennan

General Comment

I work for a company that makes military life support equipment (helmets, masks). These items are protected under ITAR / EAR regulations - so that they don't fall into the wrong hands. How can we consider GUNS (any!) to be non-military items and not controlled by ITAR? The proposed rules would eliminate Congressional oversight for important gun export deals - Congress would not longer be automatically informed about sizable sales of these weapons. On top of that, the new rules would make taxpayers pay for "licenses" via the Commerce Department- not the manufacturers via the State Department. And depending on the size of the sale- this is a lot of money. In summary: the proposed change will reduce transparency and reporting on gun exports - Congress and the public will not be aware of the total dollar value of firearms sales and where they are delivered.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-u1f8 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3026

Comment on DOS-2017-0046-0001

Submitter Information

Name: Marilyn Silvey

General Comment

I support keeping arms sales under the control of the Department of State and not moving them to the Department of Commerce. We need the strictest controls possible.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-rauw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3027

Comment on DOS-2017-0046-0001

Submitter Information

Name: S Nuckols

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-z085 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3028

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sharon Roodhuyzen

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-uxnj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3029

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cyndie Anonymus

General Comment

I oppose a rule change that would switch the regulations of firearms export from the State Department to the Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946i-3gi3
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3030

Comment on DOS-2017-0046-0001

Submitter Information

Name: Morgan Miles

General Comment

Hello, I am writing to express my concern for this proposal. It is inappropriate to make it easier for US guns and assault rifles even easier for other countries to get, especially since many of our guns are already used by "bad guys" across the globe. This treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries which is not ok. This eliminates Congressional oversight for important gun export deals which makes it easier to hide where the guns are going. This transfers the cost of processing licenses from gun manufacturers to taxpayers. This removes statutory license requirements for brokers, increasing risk of trafficking. This proposal reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Additionally this proposal is a bad idea because:

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please do not allow this policy to go into effect.

Morgan Miles, LBSW

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-4mia Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3031

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-8xca Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3032

Comment on DOS-2017-0046-0001

Submitter Information

Name: TERRY KOSOBUD

General Comment

I oppose this change in rules. Control of guns should remain within the US Department of State. The US government should not be in the business of trying to promote gun sales abroad. There is enough evidence that easy access to guns results in innocent people being killed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-io6x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3033

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Byrd

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-f0ax Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3034

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Reddy

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-xgjr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3035

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Axtell

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-6ac2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3036

Comment on DOS-2017-0046-0001

Submitter Information

Name: Danielle Machotka

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not institute this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-xz8z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3037

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Campbell

General Comment

I oppose this rule change that would switch the handling of firearms regulations from U.S. State Dept to U.S. Commerce Dept. I oppose the U.S. making money around the world while creating unrest and killings when there are already too many . More guns means more killing. Enough is enough!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-2fw6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3038

Comment on DOS-2017-0046-0001

Submitter Information

Name: John Lindsay-Poland

General Comment

Comment on Proposed Rules on Categories i-ii-iii by Depts. of State and Commerce
John Lindsay-Poland, Global Exchange

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. Please see the attached version for complete comment, sources, and notes.

The State Department proposed rule states that those weapons that would stay on the USML are inherently for military end use, adding that the items to be removed from the USML do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad. One State Department official reportedly said: We kind of refer to it as the Walmart rule. If its like something you can buy at a Walmart, why should we have control?

The Commerce Departments description of criteria for items to be moved off of the USML concludes: Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items. (p. 4) It adds that: There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities. However, the examples given here are not from prospective importing nations, but from the United States: Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their parts, components, accessories and attachments.

Retail availability in the U.S. should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively different from nearly every market in the world: with 4.4% of the worlds population, the U.S. comprises more than 45% of the worlds firearms in civilian possession.

In addition, the statement neglects another significant portion of the worldwide market for firearms: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm. In the vast majority countries, there is a presumption against civilians owning firearms unless certain conditions and requirements are met. (S. Parker, Small Arms Survey, 2011)

Many nations either do not permit or highly restrict civilian use of some or all types of semi-automatic firearms and high-capacity magazines proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms. Within the United States, semi-automatic rifles and high-capacity magazines are prohibited for retail sale in six states and the District of Columbia. Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries.

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. Many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming.

States impose limitations on the retail availability, types of firearms that may be legally purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons. The potential and actual negative consequences of the ill use of such firearms are devastating. A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

The proposed rules do not articulate any requirement for a review by State Department experts on human rights and criminal organizations. If that is the proposers intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

Attachments

GlobalExchange comment 9july2018

Comment on Proposed Rules on Categories i-ii-iii by Depts. of State and Commerce

John Lindsay-Poland, Global Exchange

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. This comment focuses on the proposed criterion of wide retail availability for firearms and munitions proposed for transfer from the USML to the Commerce Department, and includes brief comments about inter-agency review and about risks of criminal use.

The State Department proposed rule states that those weapons that would stay on the USML “are inherently for military end use,” adding that the items to be removed from the USML “do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad.” (p. 5) One State Department official was quoted in a press report about the proposed rule: “We kind of refer to it as the Walmart rule. If it’s like something you can buy at a Walmart, why should we have control?”¹

The Commerce Department’s description of criteria for items to be moved off of the USML concludes: “Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items.” (p. 4) It adds that: “There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities.” (pp. 6-7) However, the examples given here are not from prospective importing nations, but from the United States:

“Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their ‘parts,’ ‘components,’ ‘accessories’ and ‘attachments.’” (p. 7)

The retail availability in the United States should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively different from nearly every market in the world: the United States, with 4.4% of the world’s population,² comprises more than 45% of the world’s firearms in civilian possession.³

In addition, the statement neglects another significant portion of the “worldwide market for firearms”: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, the retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm.⁴ In China, firearm purchases are banned for most people, and private gun ownership is almost unheard of.⁵ In the vast majority countries, according to one of the few studies of firearms regulations, “there is a presumption against civilians owning

firearms unless certain conditions and requirements are met.”⁶

Belize, Colombia, Israel, Japan, Kenya, Turkey, and United Kingdom do not permit any civilian use of some or all types of semi-automatic firearms proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms.⁷ Other nations, including Australia, Canada, Croatia, India, Lithuania, New Zealand, South Africa, Switzerland apply special restrictions to civilian possession of semi-automatic firearms, such as proof that they are needed for self-defense, and so it cannot be said that these firearms are “widely available in retail outlets” there. We emphasize that these examples are from only a selected sample of 28 countries; a full accounting of countries where there is only limited or any retail availability of semi-automatic firearms would certainly show many more.⁸ Brazil also prohibits “assault weapons” for civilian purchase, while Chile and Colombia prohibit civilian possession of semi-automatic weapons entirely.⁹

Moreover, within the United States, semi-automatic rifles and high-capacity magazines such as those proposed to be removed from the USML are prohibited for retail sale in six states and the District of Columbia.

Magazines with a capacity of more than 10 rounds are not permitted for civilians in Australia.¹⁰ Brazil, France, Romania, Slovenia, Spain, and Turkey do not permit purchase by ordinary civilians of high-capacity magazines.¹¹ DDTC policy has reportedly excluded export of high-capacity magazines except to military and law enforcement end users,¹² but nothing in the proposed rule indicates that the Department of Commerce would enact such a policy.

Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries. In the Dominican Republic, for example, “certain firearms are considered ‘war weapons’ and can only be used by government forces, including .45 calibre pistols [and] rifles,” according a Small Arms Survey study,¹³ while Spain prohibits civilian purchase of firearms with a caliber of 20 mm or higher, which are considered to be “designed for war use.”¹⁴ More types – in some cases all types - of handguns are prohibited for civilian purchase in Belize, Canada, Colombia, Japan, Kazakhstan, the Russian Federation, the United Kingdom, and Venezuela.¹⁵

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. In addition to prohibitions or restrictions on retail availability of types of firearms, many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming. In India, for example, obtaining a license to acquire a firearm requires the applicant to demonstrate training in use of a gun, and often takes years.¹⁶ Japan requires gun buyers to go through 12 processes before purchasing any type of firearm.¹⁷

States impose limitations on the retail availability, types of firearms that may be legally

purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons, and of private security companies. The potential and actual negative consequences of the ill use of such firearms are devastating.¹⁸ A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

Processes for gun exports reflect substantive priorities and as such are integral to policy. The National Sports Shooting Foundation (NSSF) claims that under the proposed rule, “Applications would go through the same interagency review process, including by the Defense Department and the State Department’s human rights and other experts.”¹⁹ However, the proposed rules do not articulate any requirement for such a review by State Department experts on human rights and criminal organizations. If that is the proposers’ intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

¹ David Sherfinski, “Trump officials to roll back rules on some gun exports,” *The Washington Times*, May 1, 2018, <https://m.washingtontimes.com/news/2018/may/1/trump-officials-to-roll-back-rules-on-some-gun-exp/>. It should also be noted that Walmart does not operate in more than 100 nations (see: <https://corporate.walmart.com/our-story/our-locations>) and that in the United States Walmart does not sell semi-automatic assault rifles, high capacity magazines, or even (except in Alaska) handguns. See: <https://news.walmart.com/2018/02/28/walmart-statement-on-firearms-policy>.

² <https://www.census.gov/popclock/>

³ Aaron Karp, *Estimating Global Civilian-Held Firearms Numbers*, Small Arms Survey, June 2018, at: <http://www.smallarmssurvey.org/fileadmin/docs/T-Briefing-Papers/SAS-BP-Civilian-Firearms-Numbers.pdf>

⁴ Kate Linthicum, “There is only one gun store in all of Mexico. So why is gun violence soaring?” *The Los Angeles Times*, May 24, 2018, <https://www.latimes.com/world/la-fg-mexico-guns-20180524-story.html>.

⁵ Ben Blanchard, “Difficult to buy a gun in China, but not explosives,” Reuters, October 2, 2015, at: <https://www.reuters.com/article/uk-china-security-idUSKCN0RV5QV20151002>.

⁶ Sarah Parker, “Balancing Act: Regulation of Civilian Firearm Possession,” chapter 9 in *States of Security: Small Arms Survey 2011*, Small Arms Survey, Geneva, p. 6, at: <http://www.smallarmssurvey.org/fileadmin/docs/A-Yearbook/2011/en/Small-Arms-Survey-2011-Chapter-09-EN.pdf>.

⁷ Parker, pp. 9-13; Law Library of Congress, *Firearms-Control Legislation and Policy*, 2013, at: <http://www.loc.gov/law/help/firearms-control/firearms-control.pdf>.

⁸ Parker, pp. 2, 9-13.

⁹ Lisandra Paraguassu, Ricardo Brito, “U.S. biggest source of illegal foreign guns in Brazil – report,” *Reuters*, January 10, 2018, <https://af.reuters.com/article/worldNews/idAFKBN1EZ2M3>.

David Gacs, Rachel Glickhouse, and Carin Zissis, “Gun Laws in Latin America’s Six Largest Economies,” Americas Society, January 11, 2013, <https://www.as-coa.org/articles/explainer-gun-laws-latin-americas-six-largest-economies>.

¹⁰ Law Library of Congress, p. 20.

¹¹ “Overview of gun laws by nation,” at: https://en.wikipedia.org/wiki/Overview_of_gun_laws_by_nation. France: <https://www.service-public.fr/particuliers/vosdroits/F2242>. Romania: <http://www.gandul.info/reportaj/exclusiv-20-000-de-romani-s-au-inarmat-in-2011-fostul-sef-de-la-arme-din-politie-stii-cat-e-valabil-avizul-psihologic-pana-iesi-pe-usa-cabinetului-9375494>.

¹² Clif Burns, “High Capacity Magazines Exported from U.S. to Norway Shooter,” *ExportLaw Blog*, July 28, 2011, at: <https://www.exportlawblog.com/archives/3315>.

¹³ Parker, p. 8.

¹⁴ Law Library of Congress, p. 219.

¹⁵ Parker, pp. 9-13; Gacs, Glickhouse and Zissis.

¹⁶ Rama Lakshmi, “India already had some of the world’s strictest gun laws. Now it’s tightened them,” *Washington Post*, August 1, 2016, https://www.washingtonpost.com/world/asia_pacific/india-had-the-one-of-the-strictest-gun-laws-in-the-world-it-just-got-tighter/2016/08/01/affd9422-51da-11e6-b652-315ae5d4d4dd_story.html?utm_term=.f69ad52bfff.

¹⁷ 1. Take a firearm class and pass a written exam, which is held up to three times a year. 2. Get a doctor’s note saying you are mentally fit and do not have a history of drug abuse. 3. Apply for a permit to take firing training, which may take up to a month. 4. Describe in a police interview why you need a gun. 5. Pass a review of your criminal history, gun possession record, employment, involvement with organized crime groups, personal debt and relationships with friends, family and neighbors. 6. Apply for a gunpowder permit. 7. Take a one-day training class and pass a firing test. 8. Obtain a certificate from a gun dealer describing the gun you want. 9. If you want a gun for hunting, apply for a hunting license. 10. Buy a gun safe and an ammunition locker that meet safety regulations. 11. Allow the police to inspect your gun storage. 12. Pass an additional background review. Audrey Carlsen and Sahil Chinoy, “How to Buy a Gun in 15 Countries,” *The New York Times*, March 2, 2018, <https://www.nytimes.com/interactive/2018/03/02/world/international-gun-laws.html>.

¹⁸ Brazil provides an important example. See Rogert Muggah, “Where do Rio de Janeiro’s crime guns come from?” *openDemocracy*, August 8, 2016, <https://www.opendemocracy.net/democraciaabierta/robert-muggah/where-do-rio-de-janeiros-crime-guns-come-from>.

¹⁹ Larry Keane, “Why export control reform makes security and business sense,” National Shooting Sports Foundation, July 6 2018, <https://www.nssf.org/why-export-control-reform-makes-security-and-business-sense/>.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-o6bg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3039

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am a U.S. taxpayer, resident, and citizen by birth. I oppose the transfer of oversight of firearms export from the State Department to the Commerce Department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not fewer. Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946i-sow7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3040

Comment on DOS-2017-0046-0001

Submitter Information

Name: Dawn Sticklen

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-x3fu Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3041

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cathie McGeehan

General Comment

Please do not loosen the gun regulations!

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-y9ek Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3042

Comment on DOS-2017-0046-0001

Submitter Information

Name: Susan Waltz

General Comment

My comments are attached

Attachments

Comment_on_regs_6-30-18

30 June 2018

To: DDTCPublicComments@state.gov
Office of Defense Trade Controls Policy, Department of State
and
Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of
Commerce, Room 2099B, 14th Street and Pennsylvania Avenue NW, Washington DC
20230

Subject: ITAR Amendment - Categories I, II, and III
EAR Amendment - RIN 0694-AF47

I am writing to submit comments on the proposed changes to ITAR (USML) and EAR (CCL) recently published in the Federal Register. I write in a personal capacity but the views expressed are informed by my research, policy analysis, and teaching as a professor at the University of Michigan, Gerald R. Ford School of Public Policy.

By way of a few introductory remarks, I am familiar with the complexities of US arms export laws and policy, as well as the regulatory framework. There is a legitimate need for periodic updates of the USML and—in view of the labyrinth of entangled laws, regulations, and agencies involved in the current system—I am supportive of the reform initiative. I am generally more concerned about keeping weapons out of the hands of those who would misuse them than in making them easier to procure, but that end is not at odds with the objective of putting in place a single control list and a single administrative agency. The reform effort has not progressed to that point, however, and I am wary about these proposed regulatory changes as an interim step. I will also add that I have been following the export control reform project since it was announced in 2009 and this is the only time I have felt the need to express concerns about the proposed changes. That is largely due to the particular, complete and recognizable, weapons that are being considered for change.

1. I urge you to delay the effective date of the proposed changes until the Government Accounting Office or the Library of Congress has publicly reported to the Congress their impact on numerous statutes referring to “defense articles.”

If enacted, the changes would have implications for several provisions of law. From my reading of both sets of proposed regulations, I am not reassured that the implications have been fully considered. The USML is formally defined in the AECA (22 USC 2778) as a definitive list of defense articles,¹ and from a quick search of US statutes the term “defense article” appears in some 45 sections,² in many instances (but

¹ 22 USC 2778(a)(1).

² Office of the Law Revision Counsel, United States Code, <http://www.uscode.house.gov>.

not always) explicitly linked to the USML. In addition, several provisions of the AECA itself are explicitly linked to an item's presence on the USML (without necessarily referring to "defense articles"). On a separate statutory track, the Foreign Assistance Act was recently amended to include CCL 600 series items as defense articles, along with all items contained on the USML [22 USC 2304.(d)(2)(C)], but the legislation did not anticipate the new 500 series so there is likely a gap there with regards to Congressional intentions. To complicate things further, the US Munitions Import List (USMIL) makes liberal use of the term "defense article," defined as articles on the USMIL—which currently include the same items that are slated to lose the "defense article" designation that extends from inclusion on the USML – so that items designated as defense articles on the USMIL will not be considered defense articles for purposes of export.³

It is very challenging to sort out the tangle. Some of the instances where terms and definitions are at variance may not prove significant, but others may have far-reaching implications. Due to the disparate definitions and linkages, the proposal to remove specified firearms from the USML raises some important questions about the continuing applicability of provisions of law that refer to "defense articles," a term that currently encompasses such firearms. In numerous situations the current statutory treatment of non-automatic firearms would be altered – or at least become ambiguous—as a result simply of moving these weapons from Category I of the USML to the 500-series on CCL. Statutory provisions that could be affected by the proposed change range from Export-Import Bank financing of defense article sales to human rights conditionality on security assistance, to the provisions for third-party transfer of grant-supplied defense articles, and various reports to Congress. (See references in the footnote below.⁴) In some cases, the law in question is not directly linked to arms exports, but the relevant statute refers to defense articles and links the definition to items on the USML. In this way, removing specified firearms from the USML is likely to have a host of unintended and unanticipated repercussions.

Further, if semi-automatic weapons and other non-automatic firearms are removed from the USML it will impact the ability of law enforcement to charge weapons traffickers with violating the AECA as was done in several of the cases cited in a recent report from the Department of Justice on export enforcement.⁵

³ 27 CFR 447.11 and 27 CFR 447.21.

⁴ The numerous places where the meaning of "defense article" would be called into question by the proposed rules include:

- Export-Import Bank financing of defense article sales, including multiple end use considerations and other conditions (12 USC 635);
- Requirement to give Congress notice of commercial firearms sales of \$1,000,000 or more (22 USC 2776)
- Annual report to Congress on military assistance, and specifically on transfers of USML Category I firearms (22 USC 2415)
- Provisions for supplying defense articles on a grant-basis, and multiple restrictions (22 USC 2314)
- Conditions for third-party transfer of defense articles provided on a grant basis (22 USC 2314)
- Certification of end use as a condition of sale or lease of defense article (22 USC 2753)
- Post-delivery verification of credible reports of misuse of weapons (22 USC 2753)
- Brokers of items included on the USML are required to register and activity must be licensed; exporters of USML items must identify all consignees and freight forwarders in license application (22 USC 2778)

⁵ Department of Justice, "Summary Of Major U.S. Export Enforcement, Economic Espionage, And Sanctions-Related Criminal Cases," January 2018, <https://www.justice.gov/nsd/page/file/1044446/download> .

As Acting Assistant Secretary for Political-Military Affairs Tina Kaidanow explained to the House Foreign Affairs Committee last June,⁶ the US arms export architecture is very complex and involves what her predecessors have described as “cradle to grave” oversight of exported US *defense articles*. Removing that designation *defense article* from weapons that are not fully automatic has the effect of detaching them from the US Munitions List and the regulatory framework built around it: there may well be significant unintended consequences.

In the event that consideration of the proposals is not delayed, I would recommend several other changes to the proposed ITAR and EAR revisions.

2. Retain existing USML I(a) and (d) unchanged; retain the existing coverage of USML II(a) unchanged; delete proposed 0A501.a and .b; and limit proposed 0A502 to renumbering existing 0A984.

My concern here is based on principle and definition. Several of the weapons that would be moved to CCL are military-style weapons that are either used in battlefield situations or are substantially comparable to weapons as used in battlefield situations – including semi-automatic assault rifles and bolt-action sniper rifles. All of USML I(a), I(d), and II(a) are currently designated “significant military equipment” due to “their capacity for substantial military utility or capability,” per the ITAR definition.⁷ The prevalence of armed extremists and insurgents who depend on weapons currently included in USML Categories I and II makes the military utility or capability of these weapons as relevant as ever. Due to their size and long shelf life, firearms are easily diverted and resold on black markets around the world. The Department of Justice’s January 2018 summary of major US export enforcement cases noted above includes recent smuggling of semi-automatic assault rifles (and other firearms) to Dominican Republic, the Gambia, Russia via Latvia, Thailand and other destinations. In addition, the report documents the case of two men in Georgia attempting to export firearms to a range of international on the dark net, and another similar case from Kansas.⁸

While the US military may not derive great advantage from most of these weapons, they still have the military utility and capability of threatening the lives and welfare of many people around the world. It is in the interest of the US and American citizens to keep the tightest control on them. Indeed, it is for that very reason that the same weapons being proposed for removal from the US Munitions List are expected to remain on the US Munitions *Import* List, where their entry into the US will remain tightly controlled. It is also for that reason that a growing number of states are imposing limitations on the retail availability of these weapons and many retailers are voluntarily removing them from their shelves. They should remain where they are, on the USML.

⁶ “Foreign Military Sales: Process and Policy,” testimony from Tina S. Kaidanow, Acting Assistant Secretary, Bureau of Political-Military Affairs, Statement Before the Subcommittee on Terrorism, Nonproliferation and Trade, House Foreign Affairs Committee, June 2017. <https://www.state.gov/t/pm/rls/rm/2017/271928.htm>.

⁷ 22 CFR 120.7 at <https://www.gpo.gov/fdsys/pkg/CFR-2004-title22-vol1/pdf/CFR-2004-title22-vol1-sec120-7.pdf>.

⁸ Department of Justice, op. cit..

3. Before proposed regulatory changes are adopted, an opinion should be obtained from the Department of Justice concerning the legality of applying ITAR brokering restrictions to exports of firearms transferred from the USML to the CCL. Furthermore, Congress and the public should be informed as to how the proposed arrangements will address the risk of diversion.

There are several reasons to be concerned about the proposed rules pertaining to brokering. From their origin in the 1930s, a major intent of efforts to regulate arms exports has been to curtail illicit and undesirable trafficking in weapons. In the 1980s and 1990s, illicit flows of small arms flooded international markets, with calamitous effects in every region of the world. The rate of flow may have slowed since the 1990s, but as the 2018 Justice Department report attests, the efforts to supply contraband firearms are very much alive in our own time. From a global perspective, brokering laws are considered a weak link in the regulatory apparatus, to the extent that in the 1990s there was some talk of negotiating an international treaty focused entirely on arms brokering. Provisions written into US law around that time were considered some of the strongest in the world. With the transfer of specified semi-automatic and non-automatic weapons to CCL, the brokering laws would no longer be applied to these weapons (or would be applied only in a much-weakened version) and they would not be available to law enforcement for prosecution purposes.

My specific concerns with the proposal to apply existing AECA/ITAR brokering rules to items intended for transfer to the CCL are twofold, related to the dubious statutory underpinnings of the proposed rule change and to its practical implications.

(a) The first concern is a matter of statutory coherence and proper statutory authority. The brokering clauses of the AECA require commercial brokers involved in the transfer of defense articles to register with the State Department and apply for their transactions to be licensed (22 USC 2778).⁹ The AECA brokering provisions are explicitly linked to defense articles on the USML (and by implication, ITAR). Because the proposed changes to ITAR and CCL would remove specified non-automatic and semi-automatic firearms from the USML, on the face of it, it would seem that commercial brokers of these items would be released from ITAR registration and brokering requirements. To prevent this outcome, the State Department proposes a patch, by asserting that the AECA brokering provisions will also apply to the US Munitions *Import* List (which, as noted above, will continue to include the items that—for export purpose—are deemed no longer to warrant control under the USML). The intended effect is that brokers wanting to *export* items included on the list of items controlled as defense articles for *import* (but not for export) will be subject to the rules pertaining to the export of such items. The logic is convoluted at best, and it raises questions about the statutory grounding for requiring brokers who are exporting items “no longer warranting control under USML” to register with the State Department and comply with related ITAR requirements. Given the complexity of the issue and the risks associated with brokering activities, it would seem advisable and prudent to seek a legal opinion within the Executive Branch to ensure that the provisions of the AECA pertaining to brokers—including the registration requirement-- can be applied

⁹ Per 22 USC 2778 (b)(1)(A)(i), “...every person (other than an officer or employee of the United States Government acting in official capacity) who engages in the business of brokering activities with respect to the manufacture, export, import, or transfer of any defense article or defense service designated by the President under subsection (a)(1), or in the business of brokering activities with respect to the manufacture, export, import, or transfer of any foreign defense article or defense service (as defined in subclause (IV)), shall register with the United States Government agency charged with the administration of this section, and shall pay a registration fee which shall be prescribed by such regulations.

robustly to all involved in the wide range of brokering activities associated with the *export* of items on the US Munitions Import List.¹⁰ Such a legal opinion should be obtained and considered before the regulatory changes are adopted.

(b) The second issue about brokering rules relates to the practical effects of the numerous proposed changes to ITAR section 129. It is hard to imagine, in the first place, the steps by which the licensing of a transaction will be handled by Commerce and any brokering aspects (including completion of information required by 22 CFR 129.6) will be handled by State. It boggles the mind to consider how this might actually amount to a time-saving simplification of rules. I am primarily concerned about the proposed amendment 129.2(b)(2)(vii), however, which appears to negate the controls on brokering for transactions subject to EAR and open a significant loophole for unscrupulous brokers. If I have understood the proposed changes to Section 129.2 correctly, if a Michigan-based retail sports outlet licensed to sell firearms in the US wanted to sell, say, AR-15 semi-automatic rifles to clients in another country, then so long as the Michigan retailer could secure approval via the BIS licensing process, the various parties involved in shipment, financing, and possibly transshipment would be exempt from any registration and approval requirements. Nor would they necessarily be known to licensing and enforcement agents based in the Commerce Department. What in this scenario would deter an unknown and independent handler from diverting the weapons to unauthorized end-users? I would like to assume that government officials in the State and Commerce Departments have thought through the implications of the proposed rules as they might be bent for nefarious purpose as well as their service for industry cost and convenience, but the published rules do not provide assurance in that regard. **More clarification is needed about how the brokering regulations will be applied, how the inter-agency process will be managed, and the extent to which the proposed arrangements for registering and licensing brokers involved in acquiring, financing and transporting exported firearms will address the risk of diversion to non-authorized end-users.** One effect of transferring non-automatic firearms from the USML to the CCL is to remove them from the remit of the State Department's Blue Lantern program, which otherwise might be engaged to make post-shipment checks. It is not clear whether Commerce has a comparable program or what resources it will assign to monitoring the commerce in semi-automatic firearms.

4. Amend proposals for EAR Section 734.

BIS has indicated that items moving "to the CCL would be subject to existing EAR concepts of jurisdiction and controls related to 'development' and 'production,' as well operation, installation, and maintenance 'technology.'" This approach would appear to give rise to the possibility of widespread and openly sanctioned circulation of open source, non-proprietary instructions for using computer-aided design (CAD) files to produce via 3D-printing technology, or text files to produce via CNC milling the firearms removed from USML. Until now, this development has been blocked in the courts via application of ITAR provisions requiring export license. **Either the Department of Commerce should clarify that it views any software instructions for producing controlled firearms already to be within the ambit of the EAR, or EAR Section 734.7 should be amended to bring circulation of open-source, non-proprietary CAD and other electronic files under EAR control - possibly by establishing that electronic files for producing functional firearms are subject to EAR control as production technology.**

¹⁰ When questions arose in 1996 as to the authority of the President to restrict munitions imports under the AECA, the Office of Legal Counsel in the Justice Department was asked to provide an opinion. A similar request for opinion is warranted here. See https://www.justice.gov/sites/default/files/olc/opinions/1996/02/31/op-olc-v020-p0049_0.pdf.

5. **Amend provisions for License Control – Crime Control**

Shotguns controlled under 0A502 are subject to the Crime Control because they are not controlled by Wassenaar. It is not evident, however, why items 0A501a are controlled for Regional Security but not Crime Control, as firearms are a main element of crime control equipment used by police and security forces. Moreover, federal statutes explicitly prohibit the export of crime control equipment to police and security forces in countries whose governments have a consistent pattern of gross violations of internationally recognized human rights, with exceptions requiring Presidential certification. **To bring the proposed regulations into alignment with provisions of the Foreign Assistance Act [22 USC 2304(a)(2), which makes explicit reference to crime control equipment under the aegis of the (expired) Export Administration Act], items in 0A501A should be subject to Crime Control.**

6. **Include information from enhanced reporting on certain firearms exports in annual 655 Report.**

Enhanced reporting of items in the 501 series is potentially one bright spot in the proposed regulations. Several proposed changes are welcome, including: proposed changes in EAR part 748 requiring information about required import licenses; proposed changes in reporting mandated in EAR part 758; the required use of EEI filing for 0A501.a firearms; and the proposed recordkeeping requirement in part 762.

If the proposed rules are ultimately accepted, the information provided to the Wassenaar Arrangement and the UN Register of Conventional Arms will provide more granular information about US commercial exports of firearms, which seemingly could be included without significant additional effort in the annual 655 report mandated by the Foreign Assistance Act, 22 USC 2415.

7. **The balance of costs and benefits significantly favors industry over the taxpayer.**

The two sets of proposed rules include calculations of expected costs and benefits of the changes. Having invested several hours parsing the proposed rules, I suspect that one major benefit of the changes will accrue to the attorneys who help clients wend their way through federal regulations. The registration system as it was initially set up was intended to pay for itself, via modest registration and licensing fees that covered the costs of recording and updating information on US arms manufacturers and reviewing details for proposed transactions. In some sense, it has been a fee-for-service arrangement. The proposed changes significantly alter that approach with regards to firearms proposed for transfer to the CCL.

Except for the presumably few brokers unable to qualify for the firearms registration exemption outlined in proposed changes to ITAR section 129.2, no registration or license fees will be collected. Some of the transactions may be straightforward, but the workload promises to be substantial, with 4000-10,000 applications and virtually every 0A501 transaction subject to at least regional security controls, with no license exceptions available. **Whereas under the current system fees paid by industry and brokers help offset the costs of processing the license applications, under the proposed system the expenses associated with reviewing license applications will be charged to the taxpayer.** In the current political environment where government hiring is anathema, unless a streamlined new process delivers extraordinary returns, it is difficult to imagine how the tally could come out in the taxpayer's favor without

significant sacrifice of quality control. With respect to firearms exports, taxpayers and the public at large should be concerned about pressures to cut corners that could result in authorization of irresponsible transfers. **In my view as a taxpayer, the ITAR fee structure is yet one more reason for retaining non-automatic and semi-automatic firearms on the USML, and should these weapons ultimately be transferred to the CCL, I urge public officials at the Commerce Department to explore charging a service fee for processing export license applications.**

Conclusion

I appreciate the opportunity to comment on these rules. I am disappointed, however, that by and large they downplay the lethality of the weapons currently controlled in ITAR categories I and III. I realize that these documents were prepared for a different purpose than the materials posted to inform the global public about US government programs and policy, but **the difference between the tone and emphasis of the proposed rules and the public presentation of US policy on the export of small arms and light weapons over the past twenty years is striking.** By contrast to the public statements and documents, including the 2017 Congressional testimony by a State Department official, the emphasis in these regulations is on reducing transaction costs for industry rather than promoting the public good, including national security and public safety.

In response to public comments on the proposed regulatory changes, I hope that the Departments of State and Commerce will reconsider the proposal to transfer any complete weapons from the USML to CCL. In the event that the proposed regulations go forward substantially unchanged, I can only hope that other countries will tighten and strictly enforce their own import restrictions to reduce the risk of diversion and misuse.

Thank you,

Susan Waltz
Professor
Gerald R. Ford School of Public Policy
University of Michigan
Ann Arbor, Michigan

swaltz@umich.edu

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-7k53 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3043

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lisa Flowers

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-53ys Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3044

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephen Roach Knight

General Comment

I oppose the proposed rule for the following reasons:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-tol4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3045

Comment on DOS-2017-0046-0001

Submitter Information

Name: Salinda Tyson

General Comment

On May 24, the Trump Administration formally proposed a new rule to loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

The rule change would make the world a far more dangerous place because:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-1njp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3046

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymouse

General Comment

The idea that exporting and selling guns to other countries is just another sale seems absolutely ridiculous to me. This is not like shipping apples overseas. Apparently farmers of some products are now being impacted with tariffs, but we want to make it easier to sell guns?? How does this make sense? It's also looking like Russians may have made political contributions to our elections via the NRA. I'm sure I have a lot of company in thinking that this is crazy.

Thank you for your time and consideration. I hope you will vote against this change in rules.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-285j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3047

Comment on DOS-2017-0046-0001

Submitter Information

Name: Loren Libe

General Comment

I strongly OPPOSE the proposed rule.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-qjz1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3048

Comment on DOS-2017-0046-0001

Submitter Information

Name: Diane Kasten

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-sc0t Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3049

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Peeples

General Comment

Loosening the regulations over gun exports increased the risk that dangerous weapons could end up in the hands of international criminals. The proposed rule does not adequately address our security needs, terrorist threats, and the need for transparency so Congress and the public may understand the impact of these rules.

The administration should consider other alternatives to better balance the important interests at stake. The rule change removes licensing requirements for brokers, increasing the risk of trafficking, and removes the State Dept. block of 3D printing of firearms. effectively enabling such printing of lethal weapons in the US and around the world.

American citizens want more regulations on firearms especially concerning shipments that could make terrorism even more likely. We do not want less regulatory action, we want more regulations on guns and selling guns.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-9ibi Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3050

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lucille Gervase

General Comment

The rule change would make the world a far more dangerous place:

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Dep't is ill equipped to handle the technicalities that make arms exports a reasonably safe endeavor.

Please do NOT approve the change

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-68us Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3051

Comment on DOS-2017-0046-0001

Submitter Information

Name: Everard Davenport

General Comment

I am deeply troubled by loss of all reasonable controls of articles which may be used to kill human beings. Of particular concern are:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Eliminates Congressional oversight for important gun export deals.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

The Commerce Department does not have the resources to enforce export controls.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

One is merely offensive - the cost of licenses should be borne by end users and not transferred to the rest of us.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-al2y Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3052

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brynn Stanley

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-mb74 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3053

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shirley Conroy

General Comment

PLEASE delay and review again:

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-ycpm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3054

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-ol7n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3055

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bedford Silvey

General Comment

Please keep arms traffic actions under the State Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-k7gm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3056

Comment on DOS-2017-0046-0001

Submitter Information

Name: George Menassa

General Comment

I am strongly opposed to the proposed rule change. State must maintain control of such sales and Congress needs to be informed of these sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-uonf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3057

Comment on DOS-2017-0046-0001

Submitter Information

Name: Allison Gunn

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946j-27kr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3058

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hazel Ryon

General Comment

My name is Hazel Ryon. I oppose the transfer of oversight of firearms export from the state to commerce department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Please let us know if you did this and how long it took. It should take one minute or less.

Thank you!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-fy5o Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3059

Comment on DOS-2017-0046-0001

Submitter Information

Name: jeanne cormier

General Comment

fI just read about the following and I am opposed to more guns being sold

"On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake."

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-49el Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3060

Comment on DOS-2017-0046-0001

Submitter Information

Name: Evan Traylor

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-z86r Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3061

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-7awm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3062

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeff Abramson

General Comment

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

Please see full comments in the attached document.

Attachments

ProposedUSMLCatIItoIIIChanges_Comments_Abramson

Comments re: ITAR Amendment - Categories I II, and III; EAR Amendment - RIN 0694-AF47

Jeff Abramson

July 9, 2018

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests. While my comments below are as an individual concerned U.S. citizen, they are informed by my work as a senior fellow at the Arms Control Association, coordinator of a global network of professionals engaged on these issues –the Forum on the Arms Trade--, and former leader within the international Control Arms campaign that championed the creation and now implementation of the Arms Trade Treaty.

In addition to these comments, I commend to reviewers the comments by experts listed by the Forum on the Arms Trade, including: Colby Goodman, William Hartung, Christina Arabia; Adotei Akwei (on behalf of Amnesty International USA); and John Lindsay-Poland, which delve into many of these points in much greater detail.

Specific concerns include:

Loss of Congressional oversight

In 2002 Congress amended its notification threshold so that it would be informed of potential commercial sales of firearms under USML category I when they were valued at just \$1 million, as opposed to \$14 million for other major weapons sales. Such notifications have been instrumental in forestalling unwise sales, including last year to Turkey and the Philippines. No similar statutory requirement of congressional notification exists for most arms sales under the CCL, meaning Congress would lose its oversight role on these weapons.

Public reporting should be improved, not weakened

The public gains some insight into the transfer of weapons via Congressional notifications, and also through the State Department's 655 report and Blue Lantern investigations report. Those reports could provide much more detail, such as the number of specific weapons involved and other data, rather than broad categorical details (655 report). Commerce reporting provides even less data, with similar reports covering around 20 countries per year. We deserve better transparency, not worse. If this transfer of authority moves forward, the Commerce department should be required to improve its reporting.

Non-sensical to no longer consider these military weapons/defense articles

The transfer of regulatory authority to the Commerce Department is claimed to be wise because these weapons no longer "provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use," and further because many "are widely available in retail outlets in the United States and abroad."

Applying this general approach--taken from the larger export reform initiation--falls apart when we are looking at firearms and their ammunition. These weapons are and should be controlled because a

significant amount of violence that occurs, including against U.S. military and law enforcement personnel, is inflicted by small arms. Research indicates that the types of weapons being transferred to Commerce control—AR-15s and AK-47 style assault rifles and their ammunition—are “weapons of choice” of drug trafficking organizations in Mexico and other Latin American countries. Many can also be easily converted to fully automatic weapons, which will remain under USML control. U.S. military members often operate their fully-automatic-capable weapons in a semi-automatic or less-than-automatic mode. Plus, many sniper rifles to be moved to Commerce control are in U.S. military use.

In addition, in many of the countries where these weapons are likely to be marketed, they are considered military weapons and tightly controlled. As currently proposed, they would also remain on the US Munitions Import List (USMIL), which is proper. Why they would therefore not remain on a similar export list is illogical.

Being commercially available in the United States is not a good indicator of whether these weapons merit the oversight of the State Department, which is better tasked with weighing non-commercial concerns. Nor is it proper to consider these weapons somehow safer than others on the USML.

Upsetting norms on human rights as relates to the arms trade

The United States maintains strong laws against the provision of arms where certain human rights abuses are of concern (even if we do not always live up to those laws). Some of those laws may not apply to items in the 500 series. And although the State Department will be consulted in licensing decisions, it is difficult to see how this new approach would strengthen the ability of DRL and others concerned about human rights to forcefully insert human rights into arms sales decisions.

At a time where the global community must make the arms trade more responsible, these proposed changes would make its largest arms dealer, the United States, appear less responsible and less concerned about the human rights implications of the arms trade.

Making 3-D printing easier is dangerous

It is unfathomable how allowing untraceable 3-D printing of firearms serves U.S.-recognized goals to combat illicit trafficking of firearms. Our country has agreed to support the Program of Action (PoA) on small arms and light weapons and the International Tracing Instrument (ITI), has signed accords on arms transfers and tracing in the Americas, and argued for why these efforts are so important. The United States also is the world’s largest donor, as I understand it, to helping countries build their ability to trace weapons, secure weapons stockpiles, and to destroy those stocks when warranted. Yet, this transfer of authority to Commerce appears to open the door to unfettered 3D printing, which threatens to undermine nearly all those efforts.

Overall

At a fundamental level, U.S. arms are not like any other commodity and should not be treated as such. These are first and foremost killing machines. The over-emphasis on economic security threatens to jeopardize higher priorities, including peace and security concerns. If more weapons flow to countries with poor human rights records, norms around responsible weapons use and transfer will be harder to build and uphold.

This analysis is built upon documents and comments currently available at

<https://www.forumarmstrade.org/catitoiii.html>

Including:

- ✧ ["Proposed Firearms Export Changes: Key Challenges for U.S. Oversight,"](#) (see also attached 14 page document), Center for International Policy, William Hartung, Colby Goodman, Christina Arabia
- [Arguments against retail availability criterion \(pdf\),](#) public comment by John Lindsay-Poland, Global Exchange
- ["Examples of Firearms Transferred to Commerce Under New Export Rules \(pdf\),"](#) Violence Policy Center, contact Kristen Rand
- ✧ ["Business with A Bang:How the Proposal to Loosen Arms Export Regulations Threatens Human Rights,"](#) Nate Smith, Amnesty USA, June 15, 2018 and [Public Comment 41](#) from Adotei Akwei (pdf)
- ["Trump Favors Arms Industry in Effort to Loosen Export Controls,"](#) Jeff Abramson, Issue Brief, Arms Control Association, June 7, 2018.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-3dj3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3063

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen DunwoodieAman

General Comment

Keep the jurisdiction for exporting assault weapons under the State Department!

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946k-obgy
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3064

Comment on DOS-2017-0046-0001

Submitter Information

Name: Suzanne Nordmann

General Comment

My name is Suzanne and I'm a voter in San Diego, CA. As a victim of gun violence, I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. T

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-sfo3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3065

Comment on DOS-2017-0046-0001

Submitter Information

Name: Richard Baldwin

Organization: Esterline Technologies Corp.

General Comment

See attached file(s)

Attachments

Esterline_Comment_DOS_RIN_1400-AE30



Esterline Corporation
500 108th Avenue NE
Suite 1500
Bellevue, WA 98004

Tel: 425-453-9400
Fax: 425-453-2916
www.esterline.com
NYSE symbol: ESL

July 9, 2018

Sarah Heidema, Director
Office of Defense Trade Controls Policy
Bureau of Political-Military Affairs
U.S. Department of State
2401 E Street NW
Washington, D.C.

ATTN: Request for Comments Regarding Reform of USML Categories I, II, and III
Public Notice 10094, RIN 1400-AE30, 83 FR 24198

Dear Ms. Heidema:

Esterline Technologies Corporation supports the goals and objectives of the Export Control Reform (ECR) Initiative, and submits the following comments on the reform of USML Categories I, II, and III:

Summary of Comments and Recommendations

This section outlines our main comments, each of which is explained more fully in the remainder of this letter.

1. Keep the Commerce Control List free of AECA brokering.
2. Coordinate changes to USML Categories I, II, and III with changes to the United States Munitions Import List.
3. Clarify classification of propellant containers and combustible ordnance components.
4. Address conflict with companion rule 83 FR 24166.

Comments and Recommendations

1. Keep CCL free of AECA brokering

One of the main advantages of ECR is that items on the CCL are not subject to the brokering requirements in section 38(a)(1) of the Arms Export Control Act (AECA) and 22 CFR 129. This advantage has been highlighted by the U.S. Government in public

remarks, such as Under Secretary Hirschorn's address to the BIS Update 2014 Conference.

Absence of brokering controls for CCL items has more significance than the absence of double licensing. Currently, items subject to the CCL do not require registration or licensing under 22 CFR 129, period. Once an item is determined to be on the CCL, it is clear that it is not subject to brokering, so there is no need to review the USMIL or the requirements in 22 CFR 129 before engaging in business. Knowledge that items on the CCL are not subject to brokering simplifies and streamlines transactions. Addition of brokering requirements for any item on the CCL would be an unwelcome development as it would introduce a significant complicating factor.

Esterline recommends DDTC reform USML Categories I, II, and III without introducing brokering controls to items in the CCL.

2. Coordinate changes to USML Categories I, II, and III with USMIL

The proposed rule would add the need to review the USMIL for activities that are not imports to the United States. Classifying items against multiple control lists for a single transaction increases the cost and complexity of U.S. export controls.

Esterline recommends DDTC coordinate its change to USML Categories I, II, and III with the Bureau of Alcohol, Tobacco, Firearms, and Explosives so that a corresponding change is made to the USMIL at the same time. This would eliminate the need to consider both the USML and the USMIL when deciding whether a transaction involves brokering.

3. Clarify classification of both combustible and consumable case components.

With regard to the proposed paragraph III(d)(7), Esterline suggests changing the text from

(7) Cartridge cases, powder bags, or combustible cases for the items controlled in USML Category II

to

(7) Cartridge cases, powder bags, charges, propellant containers, or combustible cases for the items controlled in USML Category II, or "specially designed" parts and components therefor.

Alternately, include an explanatory note:

Note to paragraph (d)(7): combustible cases include propellant containers for mortar systems and artillery charges, consumable case sets that include both combustible and inert parts and components, and their parts such as closure tabs and interfaces.

This change would more clearly describe the range of articles that DDTC appears to be intending to capture in this paragraph, and would simplify the classification of their parts and components which are inherently for military end use.

4. Address conflict with companion rule 83 FR 24166

The proposed rule is in conflict with the companion Commerce Department proposed rule, 83 FR 24166, Docket No. 111227796-5786-01, RIN 0694-AF47. This leaves items transferred from the USML to the CCL potentially without a controlling ECCN.

Esterline recommends DDTC coordinate with BIS to resolve this conflict.

The BIS proposed rule states:

Category III of the USML, entitled “Ammunition/Ordnance,” encompasses ammunition for a wide variety of firearms that may have military, law enforcement or civilian applications. Ammunition that has only or primarily military applications would remain on the USML as would parts, production equipment, “software” and “technology” therefor.

The State Department proposed rule states with respect to USML Category III:

Additionally, paragraph (c), which controls production equipment and tooling, will be removed and placed into reserve. The articles currently covered by this paragraph will be subject to the EAR.

In effect, the BIS proposed would receive specific production and test equipment for conventional ammunition into ECCN 0B505, while the State Department proposed rule would move all production and test equipment for ammunition and ordnance to the CCL, conventional or otherwise.

ECCN 0B505 would only control equipment specially designed for the production of ammunition and ordnance that is controlled in USML Category III if it falls within the list “tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment.” This list is less than the scope of production equipment that will no longer be controlled in USML Category VIII(c) by the proposed companion rule, 83 FR 24198.

Similarly, ECCN 0E505 would not control technology for the technology for equipment specially designed for the production of ordnance, or technology for the software specially designed for such equipment.

A number of the articles proposed for USML Category III by 83 FR 24198 are not conventional ammunition, and their specially designed production equipment exceeds the specific list “tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment.”

For example, production of combustible ordnance requires specialized production machines that do not fall within the list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment." Under the proposed rules, these specialized machines would fall outside both the USML and ECCN 0B505.

Summary

Thank you for the opportunity to comment on the proposed reform of USML Categories I, II, and III. Please feel free to contact me if you have any questions about the comments and recommendations provided.

Regards,

A handwritten signature in dark ink, appearing to read "Richard R. Baldwin", followed by a long horizontal flourish.

Richard R. Baldwin
Director, Trade Compliance Technology
Esterline Technologies Corporation

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-mi3w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3066

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Fleisher

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. Please help us to protect the lives of innocent Americans. As a student, I am begging you to keep classrooms safe and restrict gun purchasing access, not loosen it. Thank you for hearing your citizen's voices.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-ypvb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3067

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sheri Rotolo

General Comment

I strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. This change would make our country and the world more dangerous in many ways:

It would remove the State Department ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally.

It would remove licensing requirements for brokers.

Would stop the program that inspects pre-license guns and issues reports.

Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and fuel increased organized crime and terrorism.

There is NO need switch control of firearms exports unless it is to pay for firearms lobbyists. Please do not approve this move.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-3ooq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3068

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Plumley

General Comment

I am completely opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-biga Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3069

Comment on DOS-2017-0046-0001

Submitter Information

Name: Miriam Krugman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946k-9ovh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3070

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Plumley

General Comment

I am completely opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946k-y1nz
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3071

Comment on DOS-2017-0046-0001

Submitter Information

Name: Margaret Hardy

General Comment

I am an active member of San Diego 4 Gun Violence Prevention and it has come to my attention that the Trump Administration is proposing to transfer licensing and oversight of firearms exports from the State Department to the Department of Commerce. It is my opinion that if this occurs, more firearms will get in the hands of criminal organizations, human rights abusers, and terrorist groups and is being pushed to open up international markets to compensate for lagging domestic gun sales. I am vehemently opposed to this proposed change for these reasons:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

Please consider not implementing this proposal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9461-2pcc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3072

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michele Berro

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-ovpw Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3073

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-r8cc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3074

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-tifc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3075

Comment on DOS-2017-0046-0001

Submitter Information

Name: Helen Hayes

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-d0zg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3076

Comment on DOS-2017-0046-0001

Submitter Information

Name: David Roth

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-5zdp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3077

Comment on DOS-2017-0046-0001

Submitter Information

Name: Beth Levin

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-4du0 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3078

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Faucette

Organization: Mark Barnes & Associates

General Comment

See attached file(s)

Attachments

ECR Parts Comment

**Comment on Proposed Rule for “International Traffic in Arms Regulations: U.S.
Munitions List Categories I, II, and III”**

RIN 1400–AE30

Comment on Proposed Cat. I(g) and Cat. I Note 1

This law firm, Mark Barnes & Associates, submits this comment on behalf of our clients engaged in the manufacture of firearms and associated parts. The purpose of this comment is to request that the final rule clarifies Cat. I(g)’s applicability to parts such as machinegun barrels that are commonly used in both semiautomatic and fully automatic firearms.

The proposed Cat. I(g) would list: “Barrels, receivers (frames), bolts, bolt carriers, slides, or sears specially designed for the articles in paragraphs (a), (b), and (d) of this category.” The articles in paragraphs (a), (b), and (d) of Category I would encompass firearms that use caseless ammunition, fully automatic firearms to .50 caliber inclusive, and fully automatic shotguns. In other words, Cat. I(g) would control barrels, receivers, bolt carriers, slides, or sears (“Parts”) specially designed for fully-automatic firearms.

The proposed rule includes Note 1 to Category I which clarifies that “Paragraphs (a), (b), (d), (e), (g), (h), and (i) of this category exclude: . . . parts, components, accessories, and attachments of firearms and shotguns in paragraphs (a), (b), (d), and (g) of this category *that are common to non-automatic firearms* and shotguns. The Department of Commerce regulates the export of such items.” (emphasis added).

Aside from a sear and receiver, it is extremely rare for any part or component of a fully-automatic firearm to not be common to a non-automatic firearm. Almost all fully automatic firearms have semi-automatic variants available on the commercial market. For example, FN USA manufactures and sells to the public a semi-automatic variant of the belt fed M249 Squad Automatic Weapon (SAW) with the only distinction from the fully automatic version being the receiver and fire control group. (<https://fnamerica.com/products/rifles/fn-m249s/> “Semi-auto replica of the government-issue FN M249 SAW”). The barrel is identical to the fully automatic version. Accordingly, it would follow that a military M249 barrel would be controlled by the Department of Commerce.

Many companies will buy fully automatic firearms with destroyed receivers (“parts kits”) from the military or police departments to construct and sell semi-automatic variants to the public. These parts kits generally consist of all parts other than the receiver (which is usually cut into three parts with a torch). Additionally, Mil-spec M4 and M16 fully automatic bolt carriers as well as barrels specially designed for fully automatic fire, are often sold with and made for civilian AR-15s.

Based upon the plain reading of the proposed Cat. I Note, some clarification is needed as to whether barrels, receivers (frames), bolts, bolt carriers, slides, or sears are non-ITAR simply because they are incorporated in semi-automatic variants on the civilian market, as almost all firearms parts, especially barrels, can be common to both semi-automatic and fully automatic firearms. We think that unless a part converts a firearm to fully automatic functionality, it should be controlled by the Department of Commerce.

Should you have any questions on this comment, please do not hesitate to contact Michael Faucette at (202) 626-0085 or michael.faucette@mbassociateslaw.com.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-tayq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3079

Comment on DOS-2017-0046-0001

Submitter Information

Name: Stephanie Nystrom

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-kk77 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3080

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anna Seidman

Organization: Safari Club International

General Comment

See attached file(s)

Attachments

07 08 2018 - Safari Club International Comments on RIN 1400 AE30 and RIN 0694-AF47



July 9, 2018

Via <http://www.regulations.gov>

Office of Defense Trade Controls Policy
Department of State
DDTCPublicComments@state.gov

Regulatory Policy Division,
Bureau of Industry and Security,
U.S. Department of Commerce,
Room 2099B,
14th Street and Pennsylvania Avenue NW,
Washington, DC 20230.

Re: Safari Club International Comments on Proposed Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories, I, II and III, Docket RIN 1400 AE30, DOS-2017-0046; and Proposed Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML), RIN 0694-AF47, Docket No. 111227796-5786-01.

Dear Sirs:

Safari Club International (SCI) submits these comments in support of the U.S. Department of State's proposed amendments to the International Traffic in Arms Regulations (ITAR) to revise Categories I, II, and III of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. SCI also supports the Department of Commerce, Bureau of Industry and Security's proposed determination that these items no longer warrant control under the U.S. Munitions List (collectively referred to as "proposed regulations").

SCI does not support the proposed regulations' finalization and implementation of a modified procedure for the temporary export of firearms and ammunition by individuals who wish to travel outside the U.S. for recreational hunting and shooting purposes. The procedure requires travelers to use the Automated Export System (AES) to register their personal firearms and ammunition. This is an inappropriate and unworkable system for the individual who wishes to temporarily export his/her firearms. As an alternative, SCI requests that the proposed regulations be modified so that they delete the AES registration requirement and formalize and codify the Form 4457 process to ensure its consistency and use by all Customs and Border Protection (CBP) officials.

Safari Club International - Washington DC Office
501 2nd Street, NE, Washington, DC 20002 • Phone 202 543 8733 • Fax 202 543 1205 • www.safariclub.org

WASHSTATEB004924

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
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Page 2 of 6

Safari Club International

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 50,000 members worldwide, many of whom are U.S. residents who travel with their firearms for hunting and recreational shooting around the world. They are individuals, not businesses, who seek only to bring their own property with them when they travel and return to the U.S. with that same property. Their activities are legal and are regulated by the countries they visit to hunt and shoot.

The Origin of the AES Registration Requirement

The export of firearms is controlled under the ITAR, which is administered by the U.S. Department of State, Directorate of Defense Trade Controls (DDTC). ITAR regulations have historically included an exemption under 22 CFR §123.17(c) allowing U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges. This exemption is widely used by hunters and other sportsmen, who travel overseas with firearms to be used for sporting and other legal purposes. To use the exemption, the U.S. person must declare the firearms and/or ammunition to CBP, carry the firearms as part of their baggage, and not transfer ownership while abroad.

In 2011, DDTC published a Federal Register notice of proposed rulemaking that principally revised the exemption related to personal protective equipment, but also included a requirement that those traveling with firearms register through the Automated Export System (AES): “The person. . . presents the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System per §123.22 of this subchapter....” 76 Fed. Reg. 16353, 163534 (Mar. 23, 2011).

The system required those registering to provide an Employer Identification Number (EIN), available only to commercial enterprises. The registration system also involved procedures far too complicated and burdensome than necessary for individuals seeking only to travel with their personal equipment. Because the registration system imposed registration obligations that would have forced hunters and shooters to make false representations to the Internal Revenue Service, jeopardized their ability to obtain permits to import the wildlife they successfully hunted, and imposed burdensome obligations unnecessary and inappropriate for non-commercial importers, CBP agreed to postpone the implementation of the registration requirements and to continue the use of Form 4457 as the mechanism to facilitate temporary firearms export. Even that solution presented problems. Due to the inconsistencies in the way that CBP personnel issued the forms, U.S. residents have encountered difficulties in taking their firearms to foreign countries (e.g. South Africa) that attribute much greater significance to Form 4457 than does the U.S.

Collection of Data Through AES Registration is Inappropriate

Without good reason, the proposed regulations would reactive the AES registration requirement for individuals seeking to temporarily export their firearms and ammunition.

Consistent with the ITAR requirements previously applicable to temporary exports of the firearms and associated ammunition covered by this rule, [Bureau

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
July 9, 2018
Page 3 of 6

of Industry and Security (“BIS”)] is proposing to modify § 758.1 of the EAR to make clear that exporters would continue to be required to file Electronic Export Enforcement (EEI) to the Automated Export System (AES) for transactions involving such firearms and associated ammunition that are otherwise authorized pursuant to License Exception BAG.

83 Fed. Reg. 24174. The purpose of the registration system is not to facilitate the temporary export and reimport of firearms and ammunition. According to CBP, the collection of export data through the registration is designed to help with the “compilation of the U.S. position on merchandise trade” and is an “essential component of the monthly totals provided in the U.S. International Trade in Goods and Services (FT900) press release, a principal economic indicator and a primary component of the Gross Domestic Product.” <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf>

The government has no need to collect this data. The data, provided by individuals who wish to temporarily export and then re-import the same personally owned equipment, has nothing to do with the “U.S. position on merchandise trade” or the “Gross Domestic Product.”

The only purpose for the collection of data from individual hunters who travel with their firearms is likely to enable the government to maintain records on these individuals and their legal activities abroad. In the proposed regulations, the BIS acknowledges that the intention of the AES filing system was to “track such temporary exports of personally-owned firearms and ammunition.” SCI strongly opposes this attempt to “follow” and retain records of the individuals who travel with their firearms for hunting purposes. These individuals have taken no actions meriting the government’s desire or need to collect and maintain data on their activities. The government should remove the requirement to collect such data.

The Proposed Regulations Recognize Flaws in the Registration System

The proposed regulations provide the public with the opportunity to comment on whether CBP has been able to remedy the problems identified when CBP first attempted to activate and implement the new requirement. The drafters also condition the reactivation of the AES registration requirement on CBP’s success in remedying the problems that plagued the introduction:

Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP’s existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition. BIS will also take into consideration any public comments submitted on this aspect of the proposed rule regarding imposing an EEI filing requirement in AES, as well as

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
July 9, 2018
Page 4 of 6

comments on the current practice of using the CBP Form 4457, as well as any other suggestions on alternative approaches for tracking such information.

83 Fed. Reg. 24174. AES registration should not be required as CBP has not remedied the problems that plagued the initial attempted implementation of the system.

The AES Registration System Requires Individuals to Provide False Information to the Internal Revenue Service

The AES registration system continues to require persons temporarily exporting firearms or ammunition to present “the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System.” The AES system requires an EIN before a user can submit any data. The Census Bureau administers the AES system, and their website still includes the following FAQ:

The Internal Revenue Service (IRS) site states that an Employer Identification Number (EIN) is for use in connection with business activity only. It further states, do not use your EIN in place of a Social Security Number. The information provided by the Census Bureau and the IRS is conflicting.

The IRS publication titled “Understanding Your EIN” which is located on their webpage (<http://www.irs.gov/pub/irs-pdf/p1635.pdf> [external link]) states that “...Employer Identification Number (EIN) is for use in connection with business activity only, do not use your EIN in place of a Social Security Number”.... However, for the purposes of registering or filing in the AES you can and should use your EIN. While it is not specifically stated, an EIN can be obtained for government reporting purposes when a person does not own a business.”

<https://www.census.gov/foreign-trade/regulations/ssnfaq.html>. The Census Bureau site expressly tells individual exporters to ignore the IRS’s instructions and to misrepresent themselves as businesses, in order to obtain an EIN. The IRS site contains no instructions providing such an exception.

The Census guidelines instruct individuals to select “Sole Proprietorship” as the “type of legal structure applying for an EIN,” which is explained by IRS as: “sole proprietor includes individuals who are in business for themselves, or household employers.” The individual is further required to select “started a new business” as the reason why the sole proprietor is requesting an EIN. For an individual seeking to travel overseas with their firearms, this information is confusing, false and entered only to obtain the EIN.

As nothing has changed to remedy this problem since the AES registration requirement was originally imposed, the regulations should not include this requirement.

The AES Registration System is Designed for Commercial Operations and Is Overly Complicated for the Individual Exporter

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
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Despite the years that have passed since CBP's attempt to require individuals to register through the AES system for the temporary export of their firearms, the agency has not made meaningful progress in reducing the overly complicated process for registration. The system is designed for businesses whose repeated use of the system merits the time and patience required for registration. The online AES Direct Users' Guide (which contains no reference to individuals, temporary export, or firearms) is a 39-page manual that an individual would be required to learn in order to register with the system. The registration mechanism is unnecessarily burdensome and complicated for the private individual who does not wish to participate in commercial trade but merely wants to temporarily take his own firearm with him outside the U.S. for a recreational hunt or shoot.

Individuals Identifying Themselves as a Commercial Enterprise Could Jeopardize Their Ability to Import Legally Hunted Animals

The requirement that individual hunters obtain an EIN, recognized by the IRS for business purposes only, could potentially jeopardize the ability of hunters to import some sport-hunted trophies from abroad. The U.S. Fish and Wildlife Service (FWS) prohibits the importation of many sport-hunted species for commercial purposes. A hunter who registers as a business for the purpose of leaving the country and exporting the firearms he plans to use to hunt outside the United States, risks the FWS prohibiting the hunter from importing his trophies and otherwise penalizing the hunter.

The AES Registration System Does Not Replace the Use of Form 4457

As mentioned above, the proposed regulations did not intend the AES registration requirement to replace CBP Form 4457 for the temporary export and reimport of personally owned firearms. Even with the AES registration requirement, temporary exporters of firearms and ammunition will still need to obtain and complete Form 4457 and display it upon re-entry into the U.S. to prove that they did not acquire the firearms abroad. Because (1) the AES registration requirement and its purpose of tracking the activities of law-abiding hunters and recreational shooters are neither necessary nor appropriate for the temporary export activities of hunters and shooters, and (2) these individuals will continue to need to obtain and display Form 4457, the logical solution would be to abandon the AES registration requirement, retain the Form 4457 practice, and improve the mechanisms for issuing the latter.

Future Use of Form 4457 Needs to Reflect the Greater Significance of the Document Outside the U.S.

While CBP has used Form 4457 as primarily a mechanism for determining whether the firearm being imported into the U.S. is the same property the individual exported when he or she left the country, other governments attribute greater significance to the document.

South Africa, for example, treats the form as a pseudo license of a U.S. resident traveling with a firearm. South African police have conditioned import of firearms into their country on the U.S. resident's possession of what South Africa considers to be a valid Form 4457. In 2017, this led

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
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to problems for hunters traveling to South Africa when the CBP began issuing Form 4457s with already expired expiration dates. Although CBP explained that the agency attributes little meaning to the form's expiration date, South African officials considered the forms expired and prohibited hunters from entering the country with their firearms due to the apparent expired appearance of the forms.

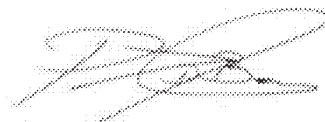
The problem was exacerbated by different offices of CBP issuing different versions of the form, which also did not match the form available from CBP's website. After representatives of SCI and other organizations engaged in numerous discussions on the issue with CBP personnel, CBP adopted a temporary solution of issuing new forms with a future expiration date. CBP needs to adopt a more permanent solution that addresses the significance of the form in other countries, such as issuing forms without any expiration date.

SCI's Recommended Resolution and Revision of the Proposed Rules

SCI recommends that the drafters delete the AES registration requirement entirely for individuals and make it clear that registration is not required for those who wish to temporarily export their firearms from the United States. No tracking of the legal activities of these hunters and shooters should be conducted and no compilation of data about these individuals should be permitted. Instead, the drafters should formally codify the use of Form 4457 for individuals and should identify a single consistent standard for the form that contains no date that could be interpreted or misinterpreted by anyone as an expiration date.

Thank you for the opportunity to comment on these proposed regulations, and in particular to advocate for the removal of a process that should not be applied to individuals who wish only to temporarily export their firearms in order to engage in legal activities outside of the United States. If you have any questions or need anything further, please contact Anna Seidman, Director of Legal Advocacy Resources and International Affairs, aseidman@safariclub.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Paul Babaz', with a stylized flourish at the end.

Paul Babaz
President, Safari Club International

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-fice Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3081

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brian Wegener

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This proposed policy is especially bad in a time when the US government is turning away refugees flee violent conflict and violent gangs.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-t19m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3082

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betsy Lindenberg

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-mqzs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3083

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Stenberg

General Comment

No! Too many guns everywhere!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-8o3m Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3084

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joshua Blank

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-3i1f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3085

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jessica Craven

General Comment

Please do not loosen the regulations on shipping guns overseas. More guns anywhere is not good! This is a cynical attempt by the NRA and the gun lobby to boost falling sales. Don't help them! Thanks.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-8nis Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3086

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lindsay Nichols

Organization: Giffords Law Center

General Comment

Please see attached.

Attachments

Giffords Exports Letter 7-9-18



July 9, 2018

SUBMITTED VIA FEDERAL E-RULEMAKING PORTAL

Director of Defense Trade Controls
U.S. Department of State
DDTCPublicComments@state.gov

AND
Regulatory Policy Division,
Bureau of Industry and Security,
U.S. Department of Commerce, Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

RE: Docket Nos. DOS-2017-0046, BIS-2017-0004

ITAR Amendment -- Categories I, II, and III and Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List (USML)

This comment is submitted on behalf of Giffords and Giffords Law Center ("Giffords") in response to the Proposed Rules published by the Departments of State and Commerce on May 24, 2018 regarding the classification and administration of exports of certain firearms and ammunition. The Proposed Rules are complex and would represent a dramatic change in the regulatory structure governing firearm exports. We are concerned that the Proposed Rules may not adequately address our national security, foreign policy, international crime, or terrorism threats. In sum, we are concerned about potential loss of life. We also believe the Proposed Rules do not adequately address the need for transparency so Congress and the public may understand the impact of these Rules on potential weapons exports.

Giffords is committed to advancing common-sense change that makes communities safer from gun violence. Operating out of offices in San Francisco, New York, and Washington, DC, our staff partners with lawmakers and advocates at the federal, state, and local levels to craft and enact lifesaving gun safety laws, participate in critical gun-violence-prevention litigation, and educate the public on the proven solutions that reduce gun violence.



THE PROPOSED RULES APPEAR DRIVEN BY THE INTERESTS OF THE GUN INDUSTRY

Even the National Rifle Association (NRA) admits that the Proposed Rules were drafted with “the goal of increasing U.S. manufacturers’ and businesses’ worldwide competitiveness.” These Rules are “designed to enhance the competitiveness of American companies in the firearms and ammunition sectors,” allowing firearms and ammunition “to be subject to a more business-friendly regulatory climate.”¹

We are concerned that the Proposed Rules elevate the desire of American gun manufacturers to compete with international arms dealers over the danger that exported firearms will contribute to international gun crime and violence. The United States must not prioritize gun industry profits over human lives.

THE PROPOSED RULES WILL DRAMATICALLY CHANGE THE LAW, RISKING NEW LOOPHOLES

We are concerned that the Proposed Rules, by shifting firearms and ammunition from the United States Munitions List (USML) to the Commerce Control List (CCL), would weaken oversight over exports of these items. As even the NRA has acknowledged, “items on the USML controlled under ITAR are generally treated more strictly,” whereas regulation under the CCL “is more flexible.” The NRA has also admitted that license applications for items on the USML are subject to “more stringent vetting” than items on the CCL.²

The Departments of State and Commerce, in drafting the Proposed Rules, have made some efforts to ensure that exports of firearms and ammunition will still be subject to oversight. But the dramatic nature of the proposed changes, and the complexity of the Proposed Rules raise serious concerns about hidden loopholes. Some areas of potential concern include:

- Congressional notification and the methods for Congress to disapprove of proposed firearm exports;
- The extent to which the Commerce Department monitors the end-users of its products; and the extent to which Congress and the public have access to information about the results of this monitoring;
- The online posting of designs for the production of firearms, and their use in the 3D printing of untraceable firearms;
- Firearms training provided to foreign security forces;
- The reporting of political contributions by gun exporters and related entities;
- The Commerce Department’s bandwidth to properly oversee these exports; and
- The regulation of brokers who act as middlemen in firearms transactions, and the threat that firearms will be diverted by these middlemen to violent ends.

¹ National Rifle Association, *Trump Administration’s Proposed Rulemakings a Win-Win for America’s Firearms Industry*, *National Security*, <https://www.nra.org/articles/20180525/trump-administration-s-proposed-rulemakings-a-win-win-for-americas-firearms-industry-national-security>

² Ibid.



According to the State Department's Proposed Rules, "The Department of Commerce estimates that 4,000 of the 10,000 licenses that were required by the [State] Department will be eligible for license exceptions or otherwise not require a separate license under the EAR." This statement seems to directly contradict the statement in the Commerce Department's Proposed Rules that "BIS would require licenses to export, or reexport to any country a firearm or other weapon currently on the USML that would be added to the CCL by the proposed rule." The Commerce Department later clarifies, "The other 4,000 applicants may use license exceptions under the EAR or the "no license required" designation, so these applicants would not be required to submit license applications under the EAR." While we recognize that other forms of oversight may be available, this dramatic difference in the number of licenses raises our concern.

We are also particularly concerned that these changes will result in an increase in the number of untraceable firearms in circulation. As 3D printing technology becomes more widely available, the likelihood that it may be used to construct operable firearms that are exempt from serialization requirements increases. Under current law, the proliferation of 3D printed firearms is held in check by the Fifth Circuit's decision in *Defense Distributed v. U.S. Dep't of State*,³ which upheld the State Department's decision that the posting of online data for the 3D printing of firearms fell within the USML. The Proposed Rules would throw that determination into question.

Inadequate gun safety laws cost human lives. When gun purchasers are not properly vetted and laws against gun trafficking are not properly enforced, guns often fall into the wrong hands and are used to perpetrate horrendous crimes and violence. The U.S. experiences this loss of life on a daily basis, with over 90 people killed each day. We do not wish to see a similar effect on an international level from the weakening of our laws regarding gun exports.

THIS CHANGE LACKS SUFFICIENT CONGRESSIONAL NOTIFICATION REQUIREMENTS

We have not seen anything in the Proposed Rules that would continue Congressional notification requirements for any of the Category I firearms that are being moved to the CCL. There are several types of sales controlled under the Arms Export Control Act that require Congressional notification. Under current law, a certification must be provided to Congress prior to the granting of any license or other approval for transactions involving the export of a firearm controlled under Category I of the USML in an amount of \$1 million or more.⁴ Congress then has the ability to enact a joint resolution prohibiting the export, which would prevent the State Department from licensing the sale. Congress generally is given 15 days or 30 days to review the transaction before a license can be granted, depending on the items being exported and the

³ 838 F.3d 451 (5th Cir. 2016).

⁴ See 22 U.S.C. § 2776, 22 C.F.R. 123.15(a)(3).



country to which it is being exported. While there are Congressional notification requirements for certain products that are controlled under the CCL, it seems that such notification requirements would not be as broad that as under the USML.

Congress should continue to receive advance notification of transactions involving firearms and to have the opportunity to prohibit these exports when appropriate. The Proposed Rules should be strengthened to protect Congress's authority in this area.

THE CHANGE MAY RESULT IN LESS TRANSPARENT END-USE MONITORING

We are concerned about a possible reduction in the monitoring of the end-users of exported firearms and publicly available information about this monitoring. The State Department currently monitors the end-users of firearm exports through its Blue Lantern program. Public reporting of Blue Lantern information is mandatory⁵ and there are readily available statistics about the results. While the Commerce Department also conducts end use monitoring, there does not appear to be as fulsome a public reporting requirement for these end use checks as under the Blue Lantern program.

The Proposed Rules do not discuss end use monitoring of the items being moved to the CCL. It is reasonable to assume that these items will fall under the general Bureau of Industry and Security end use check program. This end use check program is not as well-publicized or as formal as the Blue Lantern program, and only a very small percentage of exported items are reviewed. If the Proposed Rules move forward, this program must be strengthened to address the need to monitor the end-users of exported firearms and provide the public with information about the results.

THIS CHANGE IGNORES THE MILITARY NATURE OF MANY FIREARMS

The Proposed Rules are based on an assumption that automatic firearms are designed for and used by the military, and semiautomatic firearms are not "inherently military." This is inaccurate. Consequently, we question the President's determination that semiautomatic firearms and ammunition no longer warrant control under the USML.

In fact, members of the U.S. armed forces routinely use firearms in semiautomatic mode in combat conditions, and the designs of many semiautomatic firearms are inherently military. Assault rifles like the AR-15 were originally designed for military use. Earlier models included a selective fire option that allowed service members to switch easily between automatic and semiautomatic modes. The military included the option to fire in semiautomatic mode because military combat sometimes requires use of a firearm in

⁵ 22 U.S.C. §§ 2785, 2394, 2394-1a



semiautomatic mode. Shooting in semiautomatic mode is more accurate and hence more lethal.⁶ In fact, some members of the military use the semiautomatic mode exclusively.

The fact that some gun enthusiasts “enjoy” shooting these weapons and have labeled this activity “modern sport shooting” or “tactical shooting” does not change the design or purpose of these firearms or the danger they pose in civilian hands. The horrendous rise in mass shootings our country has suffered and the frequency with which these firearms are used in these shootings testify to this danger.

Military-style semiautomatic firearms were used to perpetrate the tragedies that occurred in an elementary school in Newtown, Connecticut, at a music festival in Las Vegas, Nevada, at a workplace in San Bernardino, California, in a movie theatre in Aurora, Colorado, and at a high school in Parkland, Florida, among others. Because of the dangerous nature of these weapons, D.C. and seven states, including the populous states of California and New York, ban them.⁷ Because of the military nature and serious lethality of these weapons; they belong on the USML.

THERE ARE ALTERNATIVES TO THE PROPOSED RULES THAT HAVE NOT BEEN EXPLORED

The real concern that seems to be driving this significant change in the way the U.S. government regulates firearms exports is that firearms and ammunition manufacturers are currently required to register with the State Department and pay a registration fee. According to the NRA, “Any business that manufactures an item on the USML, or even just a part or component of such an item, also has to register with the State Department and pay an annual fee, which is currently set at \$2,250. This registration is required even if the manufacturer has no intent to ever export the items. ... Manufacturers of items on the CCL, or their parts or components, do not have to pay an annual registration fee to the Commerce Department.”⁸

The registration fee appears to be the NRA’s primary concern with the current system for regulating the export of firearms and ammunition. The simple solution to this problem might be to waive the fee for manufacturers who do not, in reality, export these items. Waiving the fee would relieve industry of this “burden” without undoing the important policy choices made by the State Department in the regulation of these exports or requiring the Commerce Department to “reinvent the wheel” with respect to these regulations. While we would not necessarily support this proposal (it might shift the costs of manufacturer

⁶With AR-15s, Mass Shooters Attack With the Rifle Firepower Typically Used by Infantry Troops, NY Times, Feb. 28, 2018, <https://www.nytimes.com/interactive/2018/02/28/us/ar-15-rifle-mass-shootings.html>.

⁷ See Giffords Law Center to Prevent Gun Violence, *Assault Weapons* at <http://lawcenter.giffords.org/gun-laws/policy-areas/hardware-ammunition/assault-weapons/>.

⁸ National Rifle Association, *supra*.



registration to the taxpayers), we urge the Administration to carefully and thoroughly consider other alternatives to the Proposed Rules.

Sincerely,

A handwritten signature in black ink that reads "Lindsay Nichols".

Lindsay Nichols
Giffords Federal Policy Director

ABOUT GIFFORDS LAW CENTER

For nearly 25 years, the legal experts at Giffords Law Center to Prevent Gun Violence have been fighting for a safer America by researching, drafting, and defending the laws, policies, and programs proven to save lives from gun violence.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-6p5v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3087

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Klonowski

General Comment

Please retain the export of firearms within the State Department. Their more rigid oversight will help ensure that U.S. made firearms aren't used against our own servicemen and women.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-owg3 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3088

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mark Wilson

General Comment

I oppose the rule change that would transfer firearms export regulations from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-7qzc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3089

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Thank you to Mom's Rising for the following information and why I am against the rule change:

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-vueo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3090

Comment on DOS-2017-0046-0001

Submitter Information

Name: Michael Stine

General Comment

This is a bad idea that will take people's lives. I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals, places the cost of processing licenses on the U.S. taxpayers, and allows weapons to spread throughout the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-4glv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3091

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeremy Cronig

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-jp1h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3092

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maddy A

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-uxat Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3093

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ron Murray

General Comment

I SUPPORT moving the regulation regarding firearm exportation to the Commerce department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-nu6i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3094

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jonathan Boyne

General Comment

I oppose the proposed rule for the following reasons. The proposed rule change:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-95fx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3095

Comment on DOS-2017-0046-0001

Submitter Information

Name: Shir A

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-qler Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3096

Comment on DOS-2017-0046-0001

Submitter Information

Name: Leigh Anne Jasheway

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

It's bad enough that our own children can't go to school without fear of being shot -- now we're trying to endanger the rest of the world for profit for the rich? Not to mention all the talk about fighting crime and drugs and now the Trump regime is attempting to make it easier for both to flourish throughout the world.

Stop this nonsense!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-aswb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3097

Comment on DOS-2017-0046-0001

Submitter Information

Name: jeannine coyne

General Comment

To Whom It May Concern:

At a time of instability in many areas of the world, this is a time to hold fast to the oversight role and responsibilities of the US State Dept. with regards to export of firearms. On May 24th President Trump proposed a new rule that would move this responsibility to the US Dept. of Commerce. This has potential negative consequences for our national security, international crime and terrorist threats. I strongly oppose any effort to move the monitoring of firearm exports from the State to the Commerce Dept. I further oppose any loosening of regulations of firearm exports as it would increase the risk of guns falling into the hands of terrorists and rogue nations.

Respectfully submitted,

Jeannine M. Coyne

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946l-78ea Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3098

Comment on DOS-2017-0046-0001

Submitter Information

Name: CM Schneider

General Comment

The Trump administration's changes to gun regulations and its alignment with the NRA and gun manufacturers is disgusting. I oppose the rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-y1c4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3099

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bill and Marie Anonymous

General Comment

We strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The dangerous rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-boh7 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3100

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathryn Langdon

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-khgr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3101

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

We cannot make it easier for guns to get into other countries. We already know that many of the gangs in Mexico get their guns from the United States, and look at the problem it has caused that country. People are afraid to live there.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-2a4v Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3102

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aryeh Frankfurter

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-xtmk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3103

Comment on DOS-2017-0046-0001

Submitter Information

Name: Janet Yunghans

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-43au Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3104

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth McKanna

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

We need to be a leader in the area of gun safety and set an example of how to use guns responsibly. Moving the oversight

to the Commerce Department indicates we as Americans just makes it seem that guns are merely a commodity for profit

instead of a product that we must use and make available to others to use judiciously, only for reasonable and necessary purposes. Please do not permit this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-pljm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3105

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. Gun sales should not be for profit as their sole purpose is to kill, but weapons of war certainly should not be sold around the world for profit.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-u0jm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3106

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Gross

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake. I am opposed to the way this is being proposed.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-edgr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3107

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fern Wolkin

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-pkyl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3108

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer S

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-a84n Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3109

Comment on DOS-2017-0046-0001

Submitter Information

Name: Patricia Rowan

General Comment

Please do not do this. Our world is dangerous enough without flooding it with more lethal weapons. Believe it or not, there are some things more precious than money.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-umyh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3110

Comment on DOS-2017-0046-0001

Submitter Information

Name: Peter Canning

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-k18l Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3111

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kathleen Paty

General Comment

I am Kathleen K Paty and have traveled with my father to Japan and my husband to Morocco. One of my sons stood at the DMZ in Korea and the other watched the border between Egypt and Israel. I am a voter and have been for years. I support the second amendment but this is not a constitutional issue.

This rule change will make it possible for violent gangs to purchase, made in the USA, firepower, It is possible, even likely, our failure to control sales of weapons for the gangs to take over Mexico and threaten our southern border. We do not need to be stupid!

Attachments

Wepon Export

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government — i.e., taxpayers — will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency – the Commerce Department – whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946m-tq5h Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3112

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-ouuy Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3113

Comment on DOS-2017-0046-0001

Submitter Information

Name: Saba Aftab

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-qha4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3114

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jack Cook

General Comment

As the owner of a small gunsmithing operation in rural SC I urge you to transfer control of small firearms and ammunition from the State Department to the Commerce Department. It is imperative to my business that we roll-back the horrible rules that you updated in July, 2016. Effective 22 July 2016, gunsmiths suddenly found themselves subject to the regulatory authority of the Arms Export Control Act (AECA) as administered by the State Departments Directorate of Defense Trade Controls (DDTC). Regulators suddenly determined that traditionally routine gun repair and enhancement services now constitute firearms "manufacturing" and mandatory registration of my small, home-based business under International Traffic in Arms Regulations (ITAR). Tis ITAR directive advises gunsmiths to stop what they are doing and pay up or face fines and prison! (Violations under the ITAR can bring civil penalties of \$500,000 per violation and criminal penalties of up to \$1 million per violation along with up to 20 years in prison).

These rules are terribly confusing. I submitted some very direct questions to you and have never received a reply. I developed a list of typical customer service requests that raise concern with respect to ITAR registration. Specifically, I requested your determination on these examples:

- 1) Drilling, threading and installing sling swivels on rifle forend (and buttstock) for sling and/or bipod (requires drill press and screw threading)
- 2) Fabricating replacement parts - such as firing pins for rifles and pistols (requires lathe turning, milling, grinding, and polishing)
- 3) Installation of Cominolli safety special option on Glock pistols (requires cutting of frame slot with Foredom tool and fixture)
- 4) Rifle barrel setback - to correct headspace and service misfire issues (requires lathe and chambering reamer)
- 5) Slide and frame milling and cuts adding cocking serrations for improved handling, chamfering and dehorning for concealed carry, and enhanced eye appeal (requires mill, surface grinder)
- 6) Installation of gunsmith fit barrel - for accuracy upgrade or to address headspace issues (requires milling and/or TIG welding of hood and foot to precise fit)
- 7) Installation of scope mount on early rifles - for hunting, competitive shooting, and sporterizing

(requires drilling and tapping of mounting holes)

8) Re-crowning barrel - to improve or repair rifle accuracy (using lathe)

9) Installing 1911 Beavertail - to improve comfort and aim (requires precision cutting of frame, typically with mill)

10) Installing Sako-style extractor on Remington Model 700 rifle - primarily for improved reliability (requires milling and drilling of rifle bolt)

The above are, I think, a typical sampling of services that might reasonably be encountered in any gunsmith practice. Under State Department export control rulings all the above would likely constitute manufacturing and are illegal under ITAR absent payment of a large export fee. I urge you to transfer administration over to the Department of Commerce.

Obviously, the ITAR fee is a significant burden on a small gunsmith shop and will be an important factor in determining the viability and directions of my planned endeavor. I am hopeful that you will properly transfer administration and governance to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-jc2z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3115

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rich Reiner

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-cb14 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3116

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sayre Weaver

General Comment

I am a former Los Angeles County Deputy District Attorney and a lawyer who has practiced law for over 30 years and represented local governments seeking to address gun violence in their jurisdictions. I serve on the American Bar Association's Standing Committee on Gun Violence and in that capacity have worked on nationwide gun violence prevention issues. I am opposed to the proposed rule changes because both individually and collectively they greatly increase the risk of illegal firearms trafficking in this country and abroad. Small arms are already trafficked at an alarming rate into embargoed countries and into countries where they are used in conflicts in which children have been forced to be soldiers. (1) The proposed Treatment of semi-automatic assault rifles as "non-military" despite their use by U.S. troops and their use in non state and state armed conflicts, their easy conversion to fully automatic firearms, and their prohibition under the laws of many U.S. states and other countries, is contrary to the statutory framework enacted by Congress to regulate export of firearms. (2) The proposed rule would eliminate Congressional oversight for important firearms export deals and removal of Congressional oversight is directly contrary to the congressional intent of the statutes the proposed rule is meant to implement. (3) The proposed rule changes would relieve gun manufacturers of the cost of processing their licenses and imposed on taxpayer. (4) The proposed rule changes moving many approval functions out of the State Department to Commerce reduces control over firearms exports by eliminating the State Department's Blue Lantern program and the oversight that the State Department has been able to effect in denying licenses to international human rights violators through the registration system and its database. (5) The proposed rule changes enable unchecked firearms production in the U.S. and exports by removing the block on 3d printing. (6) The proposed rule changes transfer firearms export regulation to Commerce whose primary mission is to promote trade, which is contrary to congressional intent with respect to the statutes governing export of firearms. Firearms are used to kill thousands of people every year in acts of organized crime, drug trafficking, and human rights violations. We need more controls over the export of these weapons, not less.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946n-5afq
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3117

Comment on DOS-2017-0046-0001

Submitter Information

Name: Russell Paty

General Comment

I am Russell Paty and have traveled around the world three times. One of my sons stood at the DMZ in Korea and the other watched the border between Egypt and Israel. I am a voter and have been for years. I support the second amendment but this is not a constitutional issue.

This rule change will make it possible for violent gangs to purchase, made in the USA, firepower, It is possible, even likely, our failure to control sales weapons for the gangs to take over Mexico and threaten our southern border.

I oppose the proposed rule

Attachments

Weapon Export

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government — i.e., taxpayers — will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3]
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.
7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency – the Commerce Department – whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-gvbj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3118

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kaye Exo

General Comment

I oppose moving export licensing of firearms from State Dept to Commerce Dept. It eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on US taxpayers; enable 3-D printing of firearms; and allows weapons of war to more easily spread around the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-5n9x Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3119

Comment on DOS-2017-0046-0001

Submitter Information

Name: Helen Callison

General Comment

The changes that are proposed here will make it easier to transfer highly lethal weapons into the hands of people who may use them against defenseless civilians worldwide as well as, ultimately, against the United States and its citizens. It appears to have been written for the benefit and enrichment of manufacturers of arms, not for the benefit of the American people. Please reject these proposed changes.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-dixo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3120

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Palmer

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-85di Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3121

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anita Sutton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-m2eg Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3122

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carson Lommers

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-7i08 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3123

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Matsumoto

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

I am a retired teacher who had to go through numerous lock-down drills with my students. How horrible that students and teachers now must be afraid for their safety due to the accessibility of firearms. This never occurred when I was a child, nor when my children were young. It started in the mid-90's and it has only grown worse. It is appalling.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-ggno Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3124

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sarah Laughlin

General Comment

I absolutely oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-kzi4 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3125

Comment on DOS-2017-0046-0001

Submitter Information

Name: Cecil Prescod

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives. This is a bad change that will make dangerous weapons more available.

PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-946n-hlo4
Comments Due: July 09, 2018

Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3126

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am an individual who happens to work for a USML I firearms manufacturer, & am one of the principal members of its Compliance Department. I am not authorized to speak on behalf of my company, but will comment as an individual who has had "direct contact" with the ITAR, 7 days a week for the past 6 years.

In the years that I have interfaced with the firearms licensing unit of the DDTC for my applications, I have had relatively few problems and have been witness to some amendments which have resulted in positive changes. In terms of the everyday reality of working within this system, the ability to track the status of licenses in ELISA and if need be communicate directly with the licensing agent assigned to the application has been a productive process. I have also learned a great deal from working with the personnel of the DDTC unit charged with handling Category I firearms and accessories applications. The unit has proven to be both knowledgeable and helpful in achieving my licensing goals. Other than the occasional EAR99 shipment, my involvement with the BIS regulations has been minimal and I have yet to utilize the SNAP-R system, so I cannot directly judge exactly what real improvements would result from this migration, if any. The devil you know is often preferable to the one you don't.

Given that the licensing process under this proposed migration from DDTC to Commerce will still involve inter-agency review and the same staffing out to DOD and State Dept. Agencies, I don't see a clear indication of improvement, especially not in terms of processing times. This change represents a shift from one entity receiving an application to another. (Yes, we will save a few thousand dollars in registration fees.) The metric cited of 43.8 minutes for a BIS application vs. 60 minutes for DDTC application and the extrapolations of that metric to conclude a result of major savings fails to capture the true cost of the existing process or any nuances of how the process actually works. It certainly does not address the substantial burden created by the proposed the data capture for AES filing which will be amended to include make, model, and serial number.

The migration of non and semi-automatic firearms from USML I to BIS 0A501 will also initially create a substantial burden in terms of time and money for reclassifying product, retraining personal and revising all the SOPs associated with our exporting processes. I am not seeing a demonstrated case of either paperwork reduction or person-hour savings. Complicating the AES process at the end of the exporting chain is going to increase burdens for companies and place more burden on an already overloaded CBP. I do see areas where relief could and should be granted. While the change from the fee-based registration

and licensing structure of State to the no-fee structure of Commerce, will provide much needed relief for smaller companies, I have to believe that simply changing the definition of a manufacturer by including a minimum size requirement for registration could easily produce the same result and reduce the number of small businesses which are currently being caught in the net of the existing manufacturing definition and its fees which they cannot easily afford.

Also, major improvement could be easily achieved by raising value of the exemption in 123.17(a) from \$100 to \$500. While the proposed changes within LVS do increase this amount, they then reduce it by shifting the definition of value from wholesale to selling price, thus giving with one hand while taking away with the other. Permitting the export of receivers and breech mechanisms could be achieved by simply amending the "Canadian Exemption" within the ITAR. Also helpful, would be an increase in wholesale value from \$500 to \$1000 for Canada. The proposed LVS change with its "selling price" definition is not genuine relief.

I appreciate the reduced controls on technical data and the elimination of the concept of defense services which would be achieved by the migration, but given that there has been relatively little substantive change in basic firearms technology over the decades, a simple amendment to or exemption from the existing controls for firearms technology within the ITAR could likely achieve the same result without having to totally move to a new process. (I have watched competitors place manuals online-which we believe to be in violation of ITAR regulations-without repercussion.) A change in this area would level the playing field and eliminate an unfair competitive advantage and also improve our ability to market and repair firearms. Likely this type of improvement could be achieved without a major overhaul of the entire system.

In conclusion, speaking as someone who deals with ITAR functionality, I am quite certain positive relief could be achieved by judicious and minimal amendment to what already exists as opposed to a major overhaul which is certain to create a messy transition.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946n-wkfv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3127

Comment on DOS-2017-0046-0001

Submitter Information

Name: Lesly Sanocki

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This is important do not make this change.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-xl0i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3128

Comment on DOS-2017-0046-0001

Submitter Information

Name: Bonnie Tomski

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-42wq Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3129

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ian Roozrokh

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-44mo Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3130

Comment on DOS-2017-0046-0001

Submitter Information

Name: Maria Watson

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-2whj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3131

Comment on DOS-2017-0046-0001

Submitter Information

Name: Robert Menendez

General Comment

We support the Export Control Reform Initiative reforms that have been implemented to date. These changes have rationalized and streamlined a cumbersome and opaque U.S. Munitions List (USML) in ways that make it more useful for American exporters and make non-militarily-sensitive exports easier to process and more competitive internationally.

However, the Department of State has published draft regulations that would remove small arms, light weapons, and associated equipment and ammunition from Categories I, II, and III of the International Trafficking in Arms Regulations, to be subject instead to the Commerce Control List (CCL) of the Department of Commerce. This will result in less rigorous oversight of the export of these deadly weapons.

Small arms and associated ammunition are uniquely lethal; they are easily spread and easily modified, and are the primary means of injury, death, and destruction in civil and military conflicts throughout the world. As such, they should be subject to more not less rigorous export controls and oversight. We strongly oppose any changes to Categories I, II, and III that do not adequately reflect the life-and-death impact such changes will have, including by maintaining congressional oversight over these sales before export. Specifically, combat rifles, including those commonly known as sniper rifles should not be removed from the USML, nor should rifles of any type that are U.S. military-standard 5.56 (and especially .50) caliber. Semi-automatic firearms should also not be removed, and neither should related equipment or ammunition or associated manufacturing equipment, technology, or technical data.

The Arms Export Control Act (AECA) enables congressional review of exports of these articles to ensure that they comport with U.S. foreign policy goals and values. Congress took action in 2002 to ensure that the sale and export of these weapons would receive close scrutiny and oversight, including by amending the AECA to set a lower reporting threshold (from \$14 million to \$1 million) specifically for firearms on the USML. Moving such firearms from the USML to the CCL, as is being proposed, would be directly contrary to congressional intent, made clear in 2002, and would effectively eliminate congressional oversight of exports of these weapons.

Congressional oversight has proven important on multiple occasions. Over the last several years, the Executive branch has considered and proposed sales to countries and foreign entities that have engaged in human rights abuses and atrocities. In May 2017, for example, the Administration sought to sell semi-automatic pistols to the bodyguard unit of President Erdogan of Turkey, despite the fact that members of that unit had viciously attacked peaceful protestors near the Turkish Embassy in Washington, DC. The sale was only halted because congressional notification was required by law. In addition to the proposed Turkey sale, State proposed the export of 27,000 automatic rifles to the Philippine National Police in August 2016, some members of which have been credibly alleged to have committed extrajudicial killings as part of President Duterte so-called war on drugs, which has targeted mostly low-level drug users.

The Departments of State and Commerce have noted that State will still review the sales for human rights concerns if licensing is moved to the CCL. However, as demonstrated by the above examples, State has at times fallen short of its responsibility to prioritize such concerns in its consideration of such sales. Therefore, while we oppose this transfer of licensing authority to the Department of Commerce, we will also seek to ensure that congressional oversight is maintained if the proposal is implemented.

SEN. ROBERT MENENDEZ

Ranking Member, Committee on Foreign Relations, U.S. Senate

BENJAMIN L. CARDIN

United States Senator

DIANNE FEINSTEIN

United States Senator

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-ox14 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3132

Comment on DOS-2017-0046-0001

Submitter Information

Name: Annette Martinez

General Comment

Transferring the regulation of exporting firearms to the Commerce Depart makes the sale of firearms about money rather than safety. History has shown time and again that US exported firearms will be used against US citizens here and abroad.

Here are some of the many reasons rational people are opposed to this change:

- *Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- *Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- *Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- *Eliminates Congressional oversight for important gun export deals.
- *Removes statutory license requirements for brokers, increasing risk of trafficking.
- *Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- *The Commerce Department does not have the resources to enforce export controls.
- *Reduces transparency and reporting on gun exports.
- *Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The State Department is the appropriate agency to regulate the exporting of firearms. The Commerce Depart is not.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-xvyb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3133

Comment on DOS-2017-0046-0001

Submitter Information

Name: Spectra Myers

General Comment

Definitely do not want regulations weakened. All these gun sales are destabilizing other countries and sending refugees to our borders. We have to be very careful about any gun sales.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-cbrh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3134

Comment on DOS-2017-0046-0001

Submitter Information

Name: Kris VanLith

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-n283 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3135

Comment on DOS-2017-0046-0001

Submitter Information

Name: Betty Brickson

General Comment

Please do NOT transfer export license oversight for firearms from the State Department to the Commerce Department. This move only serves to benefit the gun industry and harm innocent people - including women and children - throughout the world. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-wtxm Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3136

Comment on DOS-2017-0046-0001

Submitter Information

Name: James Myres

General Comment

Greetings from Cincinnati, Ohio

I am James A. Myres, I served in the U.S. Coast Guard (1966-70), I am currently 73 years old and I am a Franciscan. I can not understand how you can consider transferring control of the export of firearms to the Department of Commerces Bureau of Industry and Security. This will directly put members of the U.S. military in harms way and will put U.S. citizens traveling abroad in harms way. Our own gun manufacturers will be killing U.S. citizens.

Firearms are used to kill a thousand people every day around the world, this policy will just make it easier for the "bad guys" to get their hands on weapons that rival what our military uses. This may create hundreds of jobs but at what cost?

Military firearms are specifically useful in acts of organized crime, political violence, terrorism, and human rights violations. We can certainly supply these weapons but is it the right thing to do? I personally do not think it is. We would be better off as individuals and as a country supporting the middle class in third world countries, not corrupt ruling classes or lawless gangs operating in the name of the governments.

The types of weapons being transferred to Commerce control, including military-style assault rifles and their ammunition, these are weapons of choice for criminal organizations in Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. These weapons and the violence they bring are driving our immigration crisis.

The export of these weapons should be subject to more controls, not less.

Peace

Jim Myres, OFS
1745 Eastwind Ct.
Cincinnati, Ohio 45230

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-yyyk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3137

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jackie Spisak

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-si4z Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3138

Comment on DOS-2017-0046-0001

Submitter Information

Name: Debra Martin

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946o-fyes Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3139

Comment on DOS-2017-0046-0001

Submitter Information

Name: Hannah Friedman

General Comment

I am against the proposed rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally. This rule would basically be helping to arm those who want to do Americans harm; exported guns and ammunition will almost certainly fall into the hands of terrorist groups, criminal organizations, human rights abusers, and other dangerous groups. Given world events, how can we even consider shipping more arms abroad? The profit gains for American gun and ammunition manufacturers is simply not worth the risk.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-4zrv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3140

Comment on DOS-2017-0046-0001

Submitter Information

Name: Elizabeth Waldron

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-jvpn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3141

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Looks like Teapot Dome all over again, just with international flavor. Shame!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-sgzd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3142

Comment on DOS-2017-0046-0001

Submitter Information

Name: Aislyn Matias

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This change in oversight is yet another example of politicians acting as neocapitalists. Enough amoral, irrational, and inhumane decision-making that doesn't represent an actual constituency!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-9sbp Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3143

Comment on DOS-2017-0046-0001

Submitter Information

Name: Vergena Copeland

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-gzn9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3144

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jeremy Anonymous

General Comment

Its morally abhorrent to keep out immigrants seeking a safer life in the US while creating policies to make it easier for dangerous criminals in other countries to get guns and terrorize the people who only want to be safe. This proposed rule is shameful and I ask that it not be implemented.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-or3u Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3145

Comment on DOS-2017-0046-0001

Submitter Information

Name: Christine Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-2hsl Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3146

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ashley Margulis

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-9f7k Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3147

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-b2ok Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3148

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ellen Beier

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-rrkr Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3149

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Dennis

General Comment

I oppose moving export license oversight for firearms from the state dept. to the commerce dept. The proposed rule change eliminates important congressional oversight for gun export deals and allows weapons of war to proliferate on the open market among other things. Now more than ever we need sensible gun legislation; it should be about morality and safety. Not profit.

Sincerely,
Carol Dennis

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-sbqt Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3150

Comment on DOS-2017-0046-0001

Submitter Information

Name: Catherine Cortelyou

General Comment

It is dangerous and foolhardy to treat weapons as simple commodities to be sold on the open market. Do we really want to arm any faction that can pay? This proposal is based rooted in greed and eliminates sound policy assessment. While 3D printing of firearms may not be preventable in the long run, it is wantonly careless to enable it. Nothing in this proposed rule change reflects sound judgement.

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-9f15 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3151

Comment on DOS-2017-0046-0001

Submitter Information

Name: Rachel Gatwood

General Comment

I object to the proposed rule change. I believe the types of firearms exports currently under the control of the U.S. Department of State should remain so, because if the new rule were to take effect, Congress would no longer be automatically informed of the exports of large amounts of weaponry to foreign countries even foreign countries with horrendous human rights records.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-hdms Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3152

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sandra Wilder

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit the retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively

condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-v4fs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3153

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-18lx Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3154

Comment on DOS-2017-0046-0001

Submitter Information

Name: Fran Carroll

General Comment

I am opposed to loosening regulations related to the export of firearms. This is so dangerous, who could be for this, except those who are in the gun manufacturing industry and others who stand to make money from it? Given our national security concerns and in this age of international terrorism, loosening regulations on the export and sale of firearms is just about the worst thing we could do. This measure could potentially increase the chance of dangerous weapons ending up in the hands of international criminals. I do not think this proposal adequately addresses our interests with regards to national security, foreign policy, international crime and terrorist threats. The administration should NOT move forward with this reckless proposal.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-w3od Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3155

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara Hohlt

General Comment

I am writing to oppose the proposed rule that would shift the responsibility of monitoring exports and import of firearms and ammunition from the State Department to the Department of Commerce. The shift would change a lot of current programs and make it far easier for weapons to be exported and divert to areas of conflict throughout the world. The State Department has a mission to reduce arms trafficking and promote peace and has successfully been doing this for years. The Commerce Department is by its name interested in increasing commerce. That is important but not in the area of providing more firearms, including semi-automatic weapons, to countries where they can be easily diverted into areas of conflict.

For instance, taking this monitoring out of the State Department would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. And It would remove licensing requirements for brokers, increasing the risk of trafficking.

It might also have an adverse effect on controlling the 3D printing of firearms. Why would we want to make it easier for gun traffickers and terrorist to get weapons. For the safety of our armed forces and our citizens we should keep the monitoring of exports/imports and of weapons brokers in the Department of State.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-q01q Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3156

Comment on DOS-2017-0046-0001

Submitter Information

Name: Carol Brownrigg

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department.

The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world.

The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946p-fw2w Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3157

Comment on DOS-2017-0046-0001

Submitter Information

Name: Angie Voss

General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-tojb Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3158

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laurajeane Kudatzky

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-snub Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3159

Comment on DOS-2017-0046-0001

Submitter Information

Name: Heidi Zollo

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would allow firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

The State Departments Blue Lantern program would be eliminated, which has been in effect since 1940. The Blue Lantern programs carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. If Commerce were responsible for exporting of firearms, then public would likely not know any information about these firearms -- what firearms are going to which countries, regimes, etc. Licencing requirements would be removed for brokers increasing the risk of trafficking -- again what firearms to which countries/regimes.

Another issue is that 3D printing of firearms would be allowed, enabling 3D printing of firearms in the US and around the world.

If firearms regulations remain with the State Department, then Congress can oversee their sales, block sales of large batches of firearms to foreign countries. Congress would not be automatically informed about weapons sales, could not stop exports for national security concerns or to countries where there are serious human rights concerns.

The world would be a more dangerous place if Commerce were to have oversight of firearm exports.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-nnh1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3160

Comment on DOS-2017-0046-0001

Submitter Information

Name: Laura sauter

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-kwv1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3161

Comment on DOS-2017-0046-0001

Submitter Information

Name: Nancy Leon

General Comment

The department of commerce should never have control over the exporting of weapons.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-f9jv Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3162

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jean Brodahl

General Comment

I strongly oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world.

The rule change increases the profits to the American gun industry while the entire world pays the cost in lives!

If this is enacted, America's reputation will be further tainted from spreading violence. Please do not move this oversight from the State Department.

Thank you.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-90wn Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3163

Comment on DOS-2017-0046-0001

Submitter Information

Name: Constance McConnell

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

This is important!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-1f3i Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3164

Comment on DOS-2017-0046-0001

Submitter Information

Name: Ann Grover

General Comment

I oppose transferring regulation of firearms exports from the State Dept to the Commerce Dept. The political and humanitarian consequences of arms sales are far too grave to not subject these sales to foreign policy review. The free market is designed to be impervious to these important considerations, and is therefore inadequate to protect US interests.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-7nuk Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3165

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Thompson

General Comment

I am against this rule. It would make the U.S. and the world a more dangerous place.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-nvd2 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3166

Comment on DOS-2017-0046-0001

Submitter Information

Name: Anonymous Anonymous

General Comment

Please do not do this/ let this pass. Weapons are already getting into the hands of people who are falling through the cracks of the current laws in place. and should not be in possession of guns..This will just exacerbate that problem. PLEASE, no more senseless loss if human life!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946q-arvj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3167

Comment on DOS-2017-0046-0001

Submitter Information

Name: P S

General Comment

I oppose the transfer of oversight of firearms export from the state to commerce department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-9jqf Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3168

Comment on DOS-2017-0046-0001

Submitter Information

Name: Jennifer Wall

General Comment

Firearms are a matter of security not of commerce. Let the state department handle matters of security and the sales of firearms rather than transferring that oversight to commerce.

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-uusc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3169

Comment on DOS-2017-0046-0001

Submitter Information

Name: Yolanda Lawas

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-8dqs Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3170

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Martinelli

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-5b4j Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3171

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mildred Sieber

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake-- including the lives of our children in the Armed Forces!!!

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-lwa6 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3172

Comment on DOS-2017-0046-0001

Submitter Information

Name: Amy Lev

General Comment

Arming the world is not conducive to peaceful resolution of ANYTHING.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-2p54 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3173

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roberta Cade

General Comment

I oppose moving export license oversight for firearms from the State Department to the Commerce Department. The proposed rule change eliminates necessary Congressional oversight for gun export deals; places the cost of processing licenses on the U.S. taxpayers; enables 3D printing of firearms; and allows weapons of war to more easily proliferate throughout the world. The rule change increases the profits to the American gun industry while the entire world pays the cost in lives.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ylmj Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3174

Comment on DOS-2017-0046-0001

Submitter Information

Name: P G

General Comment

I

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-uj11 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3175

Comment on DOS-2017-0046-0001

Submitter Information

Name: Roberta Dobbins

General Comment

I strenuously object to transferring regulation of firearms exports to the Department of Commerce. The State Department is best equipped to handle this role. It is vitally important for Congress to restrict sales of firearms to oppressive regimes, terrorists and crime organizations.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-wtqh Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3176

Comment on DOS-2017-0046-0001

Submitter Information

Name: Mary Infante

General Comment

For the following reasons I strongly protest the following provisions of The U.S. Department of State (DOS) Proposed Rule: International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III : This proposal

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ye2f Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3177

Comment on DOS-2017-0046-0001

Submitter Information

Name: Brendan Jordan

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-y7sd Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3178

Comment on DOS-2017-0046-0001

Submitter Information

Name: Andrea Doorack

General Comment

I object to the proposed changes in the International Traffic in Arms Regulations: U.S. Munitions List, Categories I, II, and III because I believe it will be more dangerous for our troops, U.S. Border Patrol and our Coast Guard. I want to know what the Defense Department thinks of taking regulation of these currently tightly restricted weapons sales and licensing of dealers away from the State Department and transferring this responsibility to the Commerce Department whose main goal is to making it easier to trade in these lethal weapons. For example, we now have troops in every country in Africa. We are fighting nonstate groups, paramilitary forces, terrorist organizations, and individuals waging war on the citizens and government security forces in Africa now. In Mexico, Central and Latin America, refugees are fleeing violence and terror from rich and powerful Narco groups and corrupt police and ineffectual governments. What do our neighbor countries and allies think of the changes will put more weapons into the hands of thugs and despots internationally? Permanent wars are profitable for arms dealers. I now understand what was at stake in keeping assault rifles and high capacity magazines available for sale in the U.S. Domestic market.. they can now be classified as nonmilitary and trafficked internationally. That is the payback for the \$30,000,000 investment in the 2016 election. I do not agree that profits for arms dealers supersede the security of our own children, citizens and security forces. I will continue to stand up for the lives of my grandchildren and to build a better future for them as citizens of this country and the world.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-fhig Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3179

Comment on DOS-2017-0046-0001

Submitter Information

Name: Joel VanderHoek

Organization: BORDERVIEW International Firearm Logistics

General Comment

BORDERVIEW appreciates the opportunity to comment on the long-awaited transition of firearms and related items from the jurisdiction of the Department of State to the Department of Commerce. We have closely followed the efforts since the early days of the Obama administration to complete this phase of Export Control Reform, and applaud the publishing of these proposed rules.

Broadly speaking, we are very supportive of the proposal and would like to underscore the well-laid justifications made in your proposed rule, and the companion Department of Commerce proposed rule, in addition to the 'Myths vs. Facts' release posted on your website. BORDERVIEW looks forward to your publishing of the Final Rule and completion of these longstanding and bipartisan efforts to simplify our nation's export control infrastructure to better control the most military-sensitive items, while maintaining appropriate controls on Dual Use items such as firearms.

We submitted a detailed comment letter to the U.S. Department of Commerce as their proposed rules would cover a supermajority of our sporting firearm export activity going forward. Nonetheless, we offer here our affirmation of the broad transition affected by these companion rules. Furthermore, we encourage a split effective date where a delayed effective date of 180 days is given so larger companies can align IT systems, etc, and an immediate effective date is allowed for smaller companies or those prepared to make the immediate shift to the EAR. This would directly impact smaller companies and especially those non-exporting companies such as gunsmiths required to register under the ITAR, who may be facing costly renewals during an extended delayed effective period. While not standard practice, there is precedent in the July 2014 notice of FR 79 37535, which gave two effective dates for that Final Rule.

Regardless of the effective date published in the Final Rule, we respectfully request that DDTC and BIS complete their review of comments and publish a Final Rule as soon as is reasonably possible. Given the long-awaited nature of these rules, prompt publishing of the Final Rule after appropriate review and consideration of all relevant comments by impacted parties would be greatly appreciated and beneficial to both industry and government.

The justification provided is clear and absolutely sensible. This is not a de-controlling as some are wrongly asserting. Regardless of recent politicization by some in Congress and the media, this has truly been an historic bipartisan effort over many years, starting in the earliest days of the Obama administration and now coming to fruition under the current administration.

Thank you for your consideration and we look forward to review of the final rule.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-8wqc Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3180

Comment on DOS-2017-0046-0001

Submitter Information

Name: Sue Grele

General Comment

I strongly urge the State Department to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing one thousand people around the world every day, we certainly should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-4ry1 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3181

Comment on DOS-2017-0046-0001

Submitter Information

Name: Barbara MacAlpine

General Comment

I oppose this proposed rule that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Moving the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-946r-ark9 Comments Due: July 09, 2018
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Docket: DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

Comment On: DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

Document: DOS-2017-0046-3182

Comment on DOS-2017-0046-0001

Submitter Information

Name: Heather Estrella

General Comment

Dear U.S. Department of State,

I am a U.S. Citizen and oppose the transfer of gun exports to the Commerce Department.

This transfers the cost of license processing to taxpayers and removes statutory license requirements for brokers, increasing The risk of trafficking and decreasing the tracking of mass weapon accumulation.

This reduces or eliminates end-use controls, such as State Department's Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since 1940's.

This says semi-automatic weapons are not military weapons yet these are the weapons used by military around the world and are used in massive world conflicts that harm millions of people.

The Commerce Department does not have the resources nor expertise to enforce export controls, even now. They will not be able to enforce tracking necessary for mass weapon sales.

This reduces the transparency and reporting on gun exports.

This transfers gun export licensing from agency with a mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade and profit.

This is not a move in the best interest of U.S. safety and citizens. It is in the interest of gun manufacturers whose mission is to boost sales at the risk of lives and stability.

Congress of the United States
House of Representatives
Washington, DC 20515

July 5th, 2018

Secretary Mike Pompeo
Department of State
2201 C Street NW
Washington, DC 20230

Secretary Wilbur Ross
Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20520

Dear Secretaries Pompeo and Ross:

We write to express our deep concern about proposed regulatory changes that would transfer control and licensing of exports of semi-automatic assault weapons, high capacity ammunition magazines and related military items from the Department of State to the Department of Commerce. We urge you to postpone implementation of these proposed changes until important issues can be addressed.

Under the current regulatory framework established under the Arms Export Control Act, export of items that are primarily for military use are regulated pursuant to the International Traffic in Arms Regulations administered by the State Department. Such items are included on United States Munitions List and are subject to stringent controls that are aimed at restricting access to military items to approved foreign governments. Exporters must be registered with the State Department and end-users are monitored under the Blue Lantern program, which provides inventory management control and accountability of all commercial arms sales and transfers. Transferring regulation of such military exports to the Department of Commerce would make it more likely that U.S.-origin weapons will end up in the hands of traffickers, terrorists, and cartels, and put them into global commerce.

We are also concerned that proposed rule changes will significantly reduce Congressional oversight and undermine efforts to prevent and prosecute firearms trafficking. Specifically, current regulations require Congressional notification of an intended commercial firearms sale in excess of \$1 million. By contrast, licenses issued by the Commerce Department are not notified to the Congress, or subject to prior review. In addition, the Foreign Assistance Act also prohibits sale of such defense articles to countries where governments have engaged in a consistent pattern of gross violations of internationally recognized human rights.

The volume of U.S. military small arms exports, which is already substantial, is certain to increase if regulation is moved to the Commerce Department. In the past year alone, Congress has

been notified of some \$660 million of firearms sales regulated under the United States Munitions List


The ramifications of the proposed transfer of oversight from the State Department to the Commerce Department are very serious: arms manufacturers and brokers of semi-automatic assault weapons will no longer be required to register with the State Department; training on the use of these items will no longer require a license, allowing private security contractors to train foreign militias in sensitive combat techniques without proper vetting; prosecutors will have less documentary evidence to prosecute arms dealers; and elected officials will have less say in the export of dangerous weapons.

For all these reasons, we urge you to postpone the proposed regulatory transfer until these important issues can be addressed.


Sander Levin


Eliot Engel


James P. McGovern


Norma J. Torres


Jamie Raskin

DEPARTMENT OF STATE CONGRESSIONAL CORRESPONDENCE
TASKER



IPS CONTROL# **H2018** 0726-000 ACTION BUREAU: PM
DATE: JUL 26 2018

IPS:

☒ SUBSTANTIVE
☒ IMAGE ENTIRE DOCUMENT

BUREAU:

BUREAU ACTION REQUESTED: RESPOND TO CCU WITHIN **2** DAYS

☒ REPLY FOR SIGNATURE BY Mary K. Waters, Assistant Secretary, Bureau of
Legislative Affairs
☐ ADDRESS ENVELOPE TO DISTRICT OFFICE
☐ DIRECT REPLY TO CONSTITUENT BY OFFICE DIRECTOR WITH COPY TO
CONGRESSIONAL OFFICE. PHONE 7-1608 WHEN COMPLETED
☐ FYI ONLY/NO RESPONSE NECESSARY
☐ REPLY FOR SIGNATURE DIRECTLY BY BUREAU
☐ OTHER ACTION: _____

FOR GUIDANCE/INFORMATION ON FORMATTING CONGRESSIONALS SEE:

[http://diplomedia.state.gov/index.php?title=Bureau of Legislative Affairs Reference Documents#Yellow Border](http://diplomedia.state.gov/index.php?title=Bureau%20of%20Legislative%20Affairs%20Reference%20Documents#Yellow%20Border)

****BUREAUS MUST MAKE TRANSFERS OF ACTION DIRECTLY WITH RECEIVING BUREAU'S FRONT
OFFICE. PLEASE NOTIFY CCU VIA UNCLASS EMAIL OF ALL TRANSFERS OF ACTION****

Due Date 7/31

ADDITIONAL INSTRUCTIONS:

☐ Multi-signer Letter: _____
☐ Special Instructions: _____
☐ EVEREST TASKER# _____
☐ Please clear with NSC prior to submission to H

FROM: Mary K. Waters (H)

Congressional Correspondence

Recommendation

JUL 26 2018

____ **For Signature by Secretary Pompeo**

For draft by _____ Bureau

X **Tasked to the Pm Bureau for
Signature by Mary K. Waters,
Assistant Secretary, Legislative
Affairs**

____ **Tasked to _____ Bureau for signature by
Post or Bureau**

____ **FYI Only—No Reply Necessary
For _____ Bureau**

Special Actions:

____ **Multi-signer letter:**

____ **Special Clearances:**

____ **For S Staff Review (H Only)**

____ **Everest Tasker# _____**

____ **Special Instructions: _____**

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 JEFF MERKLEY, OREGON
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United States Senate

COMMITTEE ON FOREIGN RELATIONS

WASHINGTON, DC 20510-6225

July 25, 2018

The Honorable Michael Pompeo
 Secretary of State
 U.S. Department of State
 2201 C Street NW
 Washington, DC 20520

LEGISLATIVE AFFAIRS

2018 JUL 26 A 7:46

RECEIVED

Dear Secretary Pompeo:

The Department of State is about to permit the public, worldwide release of dangerous information on the 3D printing of functional firearms that are undetectable by standard security measures. Such a release would allow any foreign or domestic person, including arms traffickers, terrorists, transnational criminals, and domestic abusers to effectively "download" a gun, making it much easier to evade security measures and obtain a weapon. This decision is not only alarming and irresponsible, but one that appears to evade statutory requirements and skirts an ongoing regulatory review process.

Recently, the Department settled a lawsuit by a U.S. firm seeking to post blueprints and other information on the Internet that would allow anyone with a 3D printer to create plastic firearms. Based on reports of the terms of the settlement, the Department has now agreed that the information can be exempt from the export licensing requirements of the International Trafficking in Arms Regulations (ITAR). Even more troubling, the Department also agreed to temporarily suspend the relevant ITAR restrictions to allow this otherwise prohibited dissemination.

Yet this "temporary" suspension will effectively allow a permanent and continuing export. Once posted on the Internet, these files will be shared, downloaded, and used to create firearms. As such, this action is tantamount to a permanent removal of an item from the United States Munitions List, but without the 30-day notice to the Senate Foreign Relations Committee and House Foreign Affairs Committee as required by the Arms Export Control Act.

It is hard to see how making it easier for criminal and terrorist organizations to obtain untraceable weapons is in the foreign policy and national security interests of the United States. This action by the State Department makes the work of U.S. and international law enforcement and counter-terrorism agencies—and the U.S. Transportation Security Agency—all the more difficult and heightens the risk to innocent Americans and others from terrorist and extremist attacks. Moreover, the domestic risk cannot be understated, especially with the high rates of gun violence in our schools, churches, clubs and public gathering places. The release of these blueprints permits anyone, even those banned from gun ownership due to a criminal

LMD/TB

conviction, to build their own gun. These "ghost guns" also pose a problem for law enforcement as such firearms lack a serial number and are thus untraceable.

Given the far-reaching and dangerous consequences of this decision, I urge you to immediately review and reconsider the Department's position, and to ensure that this and any other decision regarding arms export control complies fully with the letter and spirit of the Arms Export Control Act. Further, any release should not occur until the Department, Congress, and the public have ample time to review the consequences of this action.

Sincerely,

A handwritten signature in black ink, reading "Robert Menendez". The signature is fluid and cursive, with a large, stylized "R" and "M".

Robert Menendez
Ranking Member

United States Senate

WASHINGTON, DC 20510

July 26, 2018

The Honorable Mike Pompeo
Secretary of State
U.S. Department of State
2201 C Street N.W.
Washington, DC 20520

RECEIVED
2018 JUL 27 A 11:46
LEGISLATIVE AFFAIRS

Dear Secretary Pompeo:

We write with great alarm regarding the decision last month by the Department of Justice (DOJ) to settle the lawsuit brought against the State Department by the gun rights advocacy groups Defense Distributed and the Second Amendment Foundation. We urge the State Department not to allow Defense Distributed to publish online blueprints for undetectable, three-dimensional ("3-D") printable firearms.

In 2015, Defense Distributed and the Second Amendment Foundation sued the State Department, challenging the State Department's determination that Defense Distributed violated federal export controls and its demand that Defense Distributed remove from the internet its blueprints for 3-D printable firearms. Throughout the course of the lawsuit, the government maintained that its position was well-supported under the Arms Export Control Act and the International Traffic in Arms Regulations (ITAR). Indeed, as recently as April 2018, the Trump administration filed a motion to dismiss the suit in which it argued that "[w]hatever informational value there may be in the process by which 3-D printing occurs," Defense Distributed's Computer Aided Design files "are indispensable to a [3-D] printing process used to create firearms and their components," and "are also functional, directly facilitate the manufacture of weapons, and may properly be regulated for export."¹

Despite the court's twice siding with the government's position, in a stunning reversal of course last month, DOJ settled the suit and agreed to allow for the public release of Defense Distributed's 3-D firearm printing blueprints in any form. Specifically, the State Department has agreed to allow Defense Distributed to publish its blueprints by July 27, 2018 — by making a "temporary modification" of the United States Munitions List (USML) and granting Defense Distributed an "exemption" from ITAR regulations. The administration also made the puzzling decision to pay nearly \$40,000 in legal fees to the plaintiffs using taxpayer dollars.

This settlement is inconsistent with the administration's previous position and is as dangerous as it is confounding. The settlement will allow these blueprints to be posted online for unlimited distribution to anyone — including felons and terrorists — both here in the United States and

¹ *Defense Distributed v. U.S. Dep't of State*, Case 1:15-cv-00372-RP, Defs.' Mot. Dismiss Second Am. Compl., at 1 (W.D. Tex. Apr. 6, 2018).

CCM

Secretary Pompeo
Page 2 of 4

abroad. It also sets a dangerous precedent in defending against challenges to other legally sound determinations made by the State Department under the Arms Export Control Act and ITAR.

Yesterday, in response to questioning by Senator Markey before the Senate Foreign Relations Committee, you committed to reviewing the decision to allow Defense Distributed to publish its blueprints online. In accordance with this commitment, we ask that you suspend the special treatment given to Defense Distributed while you undertake this review.

In addition to suspending these actions, we ask that, prior to August 1, 2018, the State Department provide us with a written explanation and briefing on the reasoning behind the decision to settle this litigation in the manner it did. The American people have a right to know why their government agreed to such a dangerous outcome.

Specifically we request a response to the following questions:

1. Does the State Department no longer believe that the online publication of blueprints for the 3-D printing of firearms is a violation of federal export controls? If so, when did this reversal of opinion occur and why? Was there a change in the law or the facts that prompted this change? If so, please explain the change in either the law or facts that prompted the change.
2. On May 24, 2018, the State and Commerce Departments published proposed rules to amend Categories I, II, and III of the USML and transfer from the State Department to the Commerce Department oversight over export of certain firearms, ammunition, and related items. What role did the Defense Distributed litigation play in deciding to publish these proposed rules? What analysis, if any, did the State and Commerce Departments undertake to evaluate the potential risks of the proposed rules changes on export controls on the online publication of blueprints for 3-D printed firearms? If the State Department did evaluate the risks, what risks were identified? Please identify the individuals involved in that analysis.
3. If these proposed rules are finalized and jurisdiction over technical data related to the design, production, or use of semi-automatic or military-style firearms is transferred to the Commerce Department, the release into the public domain of instructions for printing 3-D firearms will be permissible. Does the State Department have concerns about the dangerous consequences of this rules change? Did the State Department make the Commerce Department aware of the litigation between it and Defense Distributed and the Second Amendment Foundation, the terms of the settlement, or the consequences of online publication of blueprints for 3-D printed firearms? If so, please identify to whom and how that information was conveyed.
4. Given the risks of the government abdicating control over the online publication of blueprints for 3-D printed firearms, why did the State Department agree to move forward with the rulemaking? How does the State Department plan to mitigate these risks?

Secretary Pompeo
Page 3 of 4

5. The settlement agreement resolving the lawsuit brought by Defense Distributed and the Second Amendment Foundation obligates the State Department to “draft and fully pursue . . . the publication in the Federal Register of a notice of proposed rulemaking and final rule, revising USML Category I to the technical data that is the subject of the” litigation. Why did the State Department agree to this relief?
6. The settlement agreement resolving the lawsuit brought by Defense Distributed and the Second Amendment Foundation obligates the State Department, “while the above-referenced final rule is in development,” to announce “a temporary modification, consistent with the International Traffic in Arms Regulations (ITAR), 22 C.F.R. § 126.2, of USML Category I to exclude the technical data that is the subject of the” litigation, and to publish the announcement on the website of the Directorate of Defense Trade Controls on or before July 27, 2018. Why did the State Department agree to this relief? What will this temporary modification likely entail? Will the State Department put any restrictions on the types of 3D technical data that can be released to the public without prior U.S. government approval, including types of firearms, 3D printing, and materials, among other possible issues? Why did the State Department fail to provide 30 days’ notice to the relevant congressional committees of its intention to remove Defense Distributed’s “technical data” from the USML, as required by 22 U.S.C. § 2278(f)(1)?
7. The settlement agreement resolving the lawsuit brought by Defense Distributed and the Second Amendment Foundation obligates the State Department to issue “a letter to Plaintiffs on or before July 27, 2018 signed by the Deputy Assistant Secretary for Defense Trade Controls, advising that [the 3-D printing files at issue in the litigation] are approved for public release (i.e., unlimited distribution) in any form and are exempt from the licensing requirements of ITAR because they satisfy the criteria of 22 C.F.R. § 125.4(b)(13).” Why did the State Department agree to this relief?
8. The settlement agreement resolving the lawsuit brought by Defense Distributed and the Second Amendment Foundation obligates the State Department to “acknowledg[e] and agree[] that the temporary modification of USML Category I permits any United States person . . . to access, discuss, use, reproduce, or otherwise benefit from the technical data that is the subject of the Action, and that the letter to Plaintiffs permits any such person to access, discuss, use, reproduce[,] or otherwise benefit from the” 3-D printing files at issue in the litigation. Why did the State Department agree to this relief?
9. The settlement agreement resolving the lawsuit brought by Defense Distributed and the Second Amendment Foundation obligates the State Department to pay the Plaintiffs \$39,581.00, reported to be for a portion of their legal fees. Please identify what funding source within the government this payment was drawn from. Additionally, please provide information regarding why the State Department agreed to this relief.

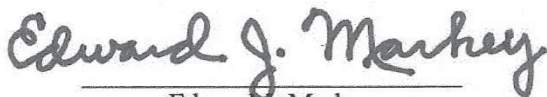
We are concerned about the immediate impact of publishing these 3-D gun blueprints: Once the State Department allows them to circulate freely online, the threats to U.S. and international security will be irreversibly increased. We urge you not to grant this special treatment to Defense

Secretary Pompeo
Page 4 of 4

Distributed — but rather to postpone this action while you fulfill your commitment to review this decision, and until the above questions can be adequately addressed.

Thank you for your prompt attention to this matter. Should you have any questions about this request, please contact Callan Bruzzone of Senator Markey's staff at 202-224-2742.

Sincerely,



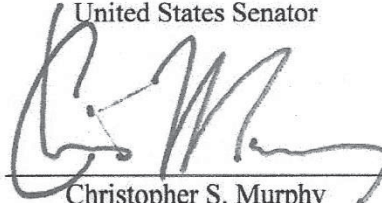
Edward J. Markey
United States Senator



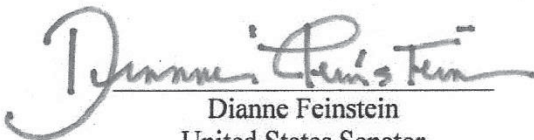
Bill Nelson
United States Senator



Richard Blumenthal
United States Senator



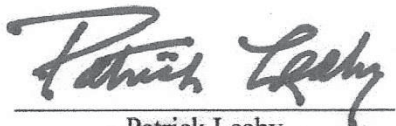
Christopher S. Murphy
United States Senator



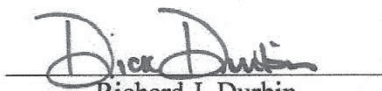
Dianne Feinstein
United States Senator



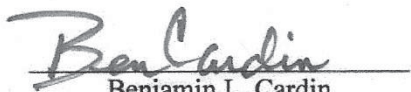
Elizabeth Warren
United States Senator



Patrick Leahy
United States Senator



Richard J. Durbin
United States Senator



Benjamin L. Cardin
United States Senator

DEPARTMENT OF STATE CONGRESSIONAL CORRESPONDENCE
TASKER



IPS CONTROL# **H2019** 0801=003 ACTION BUREAU: Pm

DATE: AUG 01 2019

IPS:

☒ SUBSTANTIVE

☒ IMAGE ENTIRE DOCUMENT

BUREAU:

BUREAU ACTION REQUESTED: RESPOND TO CCU WITHIN **2** DAYS

☒ REPLY FOR SIGNATURE BY Mary Elizabeth Taylor, Assistant Secretary,
Bureau of Legislative Affairs

☐ ADDRESS ENVELOPE TO DISTRICT OFFICE

☐ DIRECT REPLY TO CONSTITUENT BY OFFICE DIRECTOR WITH COPY TO
CONGRESSIONAL OFFICE. PHONE 7-1608 WHEN COMPLETED

☐ FYI ONLY/NO RESPONSE NECESSARY

☐ REPLY FOR SIGNATURE DIRECTLY BY BUREAU

☐ OTHER ACTION: _____

FOR GUIDANCE/INFORMATION ON FORMATTING CONGRESSIONALS SEE:

<http://diplomedia.state.gov/index.php?title=Bureau> of Legislative Affairs Reference Documents#Yellow Border

****BUREAUS MUST MAKE TRANSFERS OF ACTION DIRECTLY WITH RECEIVING BUREAU'S FRONT
OFFICE. PLEASE NOTIFY CCU VIA UNCLASS EMAIL OF ALL TRANSFERS OF ACTION****

Due Date 8-6-19

ADDITIONAL INSTRUCTIONS:

☐ Multi-signer Letter: _____

☐ Special Instructions: _____

☐ EVEREST TASKER# _____

☐ Please clear with NSC prior to submission to H

FROM: A/S Mary Elizabeth Taylor (H)
Congressional Correspondence
Recommendation

AUG 01 2019

____ **For Signature by Secretary Pompeo**
For draft by ____ **Bureau**

☒ **Tasked to the** PM **Bureau for**
Signature by Mary Elizabeth Taylor
Assistant Secretary, Legislative
Affairs

____ **Tasked to** ____ **Bureau for signature by**
Post or Bureau

____ **Request for Briefing** ____ **Bureau**

____ **FYI Only—No Reply Necessary**
For ____ **Bureau**

Special Actions:

____ **Multi-signer letter:** _____

____ **Special Clearances:** _____

____ **Everest Tasker#** _____

____ **Special Instructions:** _____

TOM COTTON
ARKANSAS

326 RUSSELL SENATE OFFICE BUILDING
WASHINGTON, DC 20510
PHONE: (202) 224-2353

United States Senate

COMMITTEES
ARMED SERVICES
BANKING, HOUSING, AND
URBAN AFFAIRS
JOINT ECONOMIC COMMITTEE
SELECT COMMITTEE ON INTELLIGENCE

July 31, 2019

The Honorable Michael R. Pompeo
Secretary
U.S. Department of State
2201 C St NW
Washington, DC 20520

The Honorable Wilbur Ross
Secretary
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Gentlemen,

I am writing regarding the transfer of export licensing authority for sporting and commercial firearms and ammunition products currently on Categories I, II, and III of the United States Munitions List (USML) from the Department of State – Directorate of Defense Trade Controls (DDTC) to the Department of Commerce – Bureau of Industry and Security (BIS) where the products would be controlled on the Commerce Control List (CCL) and the Export Administration Regulations (EAR). I urge you both publish the new rules for this transfer as soon as is practicable.

The export of Category I, II, or III items under the CCL process is extremely important to the domestic firearms and ammunition industry, primarily because it reduces the export approval timeline. The ability to rapidly reply to international business opportunities allows U.S. companies to remain competitive in the global market and creates high-quality manufacturing jobs at home. Furthermore, some North Atlantic Trade Organization (NATO) allies have indicated a desire not to purchase small arms from U.S. vendors due to the overly burdensome process required to receive an exemption for the sale under the International Traffic in Arms Regulations (ITAR). This creates an environment where foreign countries can compete unfettered for our military small arms programs while many foreign nations are restricting US companies from competing in theirs. This regulation has not only been prohibitive for initial sales to allies but additionally creates excessively burdensome procedures for follow-on maintenance contracts.

Therefore, I am requesting the Departments of State and Commerce to publish the final rules to streamline the export licensing process in support of our domestic firearms and ammunition industry. I urge you to move forward with this process to ensure our competitiveness in the global market.

Sincerely,



Tom Cotton
United States Senator

JONESBORO
300 SOUTH CHURCH, SUITE 338
JONESBORO, AR 72401
(870) 933-6223

SPRINGDALE
1108 SOUTH OLD MISSOURI ROAD, SUITE B
SPRINGDALE, AR 72764
(479) 751-0879

LITTLE ROCK
1401 WEST CAPITOL AVENUE, SUITE 235
LITTLE ROCK, AR 72201
(501) 223-9081

EL DORADO
106 WEST MAIN STREET, SUITE 410
EL DORADO, AR 71730
(870) 864-6562

PUBLIC SUBMISSION

As of: 5/30/18 9:46 PM
Received: May 24, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93c2-zubs
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0002

Public comment 1. Individual. W Pickering. 5-24-18

Submitter Information

Name: William Pickering

Address:

14208 S. Longview Lane
Plainfield, IL, 60544

Email: Epockering1972@gmail.com

Phone: 815-931-1946

General Comment

I believe this rule change is not in the best interest of the country or world. While the rule change seems to want to put certain weapons into the hunting category, weapons like the AR-15 are designed as weapons of war.

This is a threat to our interests overseas. Having these weapons transferred overseas creates a security threat as they can be procured from legitimate stores by terrorists and other criminal elements. There is no doubt American weaponry is far superior to the manufacturers and would serve our enemies well. As noted in various studies, there is a high percentage of weapons being used in terrorism and crimes around the world.

I can appreciate the administration trying to help the gun industry, but we can not feed the next generation of terrorists with US made weapons.

PUBLIC SUBMISSION

As of: 5/30/18 9:51 PM
Received: May 25, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93cn-59a7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0003

Public comment 2. Individual. M Sterland. 5-25-18

Submitter Information

Name: Michael Sterland

Address:

143 Ennerdale Road

Cleator, Cumbria, United Kingdom, CA255LQ

Email: mikesterland@btopenworld.com

General Comment

As a UK citizen, I often travel to the US & visit stores such as Cabelas & Sportsman's Warehouse whilst there. I cannot fail to notice the price of certain items (cartridge cases & bullets) are less than half what we are charged in the UK for the same item.

I don't understand why it isn't allowed for us to purchase & bring back the small amounts of these items we wish to purchase.

After all, they're already available here- at a ridiculous price.

Because of this, I buy components made in the EU, as they're not hamstrung with regulations & thus measurably cheaper.

Fix this & US manufacturers will see a significant increase in demand from UK based firearms owners.

PUBLIC SUBMISSION

As of: 5/30/18 10:06 PM
Received: May 26, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93cu-2uf1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0004

Public comment 3. Individual. T Goodwin. 5-26-18

Submitter Information

Name: Thomas Goodwin

Address:

18229 Bridlington Drive
Edmond, OK, 73012

Email: thomaswgoodwiniii@gmail.com

Phone: 4054209889

General Comment

Currently, many small firearms companies have many regulations stacked against them. Even some gunsmithing is pushing gunsmiths into a manufacturer category. This is just one of the many problems that could be changed with this proposed rule. It's time we reclassified many of these items and services to remove them from the ITAR and USML and place them on the CCL. Free up the market for our small companies and let the industry thrive.

PUBLIC SUBMISSION

As of: 5/30/18 10:07 PM
Received: May 26, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93d3-yh37
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0005

Public comment 4. Individual. L White. 5-26-18

Submitter Information

Name: Larry White

Address:

1196 Eleanor Avenue
Rohnert Park, CA, 94928

Email: whitelm@excite.com

Phone: 7075888832

Fax: 94928

General Comment

I fully support this. However, I believe all private individuals traveling abroad with personally owned firearms for lawful purposes such as hunting or competition should not be required to document the "export" through an official website designed for commercial exporters.

Also, since suppressors are very common among hunters and recreational shooters both in the U.S. and abroad and do not provide the U.S. or its allies with any special military advantage, the published proposals should include these on the CCL.

PUBLIC SUBMISSION

As of: 5/30/18 10:05 PM
Received: May 26, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93d4-e3lk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0006

Public comment 5. Individual. T Weeks. 5-26-18

Submitter Information

Name: Thomas Weeks

Address:

2574 Bermuda Ct
Loganville, GA, 30052

Email: tjweeks1@comcast.net

Phone: 770-554-1256

General Comment

Please consider repealing the federal tax stamp for a sound suppressor for firearms. Suppressors are common shooting devices in Europe and many other countries of the world. I have lost around 50 % of my hearing due to using firearms even though I always use hearing protection. Under the current rules due to taxes a suppressors are beyond the reach of normal users. The time for purchasing a suppressor averages a wait between 6 and 12 months. Please amend this item to help people save their hearing.

PUBLIC SUBMISSION

As of: 5/30/18 10:11 PM
Received: May 26, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93d5-oaa4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0007

Public comment 6. Individual. M Larsen. 5-26-18

Submitter Information

Name: Merlin Larsen

Address:

3715 Newell Drive

West Jordan, UT, 84088

Email: douglarsen50@msn.com

Phone: 8012809696

Fax: 84088

General Comment

I am responding as a life member of the NRA, at the behest of an NRA-ILA email alert to do so. I am in complete agreement that these changes to the economic strictures on guns and components, that are of civilian application and use, are necessary and should be done. Loosened or eased commercial regulations on US gun manufacturers and the components thereof, will make the US economy improve by being more competitive internationally. Meanwhile, the strictly military weapons and components will remain highly regulated (scrutinized), as they should be.

PUBLIC SUBMISSION

As of: 5/30/18 10:13 PM
Received: May 26, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93d6-eoxk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List

Document: BIS-2017-0004-0008

Public comment 7. Anonymous. 5-26-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Sound suppressors should be included in the CCL. Sound suppressors are increasingly used for hunting and recreational shooting and their technology is rudimentary at best. They do not hold proprietary knowledge limited to the US and provide no advantage to the military of the US or it's allies.

PUBLIC SUBMISSION

As of: 5/30/18 10:17 PM
Received: May 27, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93dq-k7l3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0009

Public comment 8. Individual. A Bourdon. 5-27-18

Submitter Information

Name: Andrew Bourdon

General Comment

In regards to Docket BIS-2017-0004 ("Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List"):

I support most of these proposed rule changes, as they would streamline the regulatory process. This would benefit Americans by reducing restrictions to trade, providing buyers and sellers with more options in the marketplace. It would also make US manufacturers more competitive against foreign importers. Finally, simpler and clearer rules will make it easier for new businesses to know what legal niches are available to them. The current system can be so vague and complex that many would-be entrepreneurs simply give up before starting because they're afraid of innovating in a way that ends up being deemed illegal for export.

PUBLIC SUBMISSION

As of: 5/30/18 10:20 PM
Received: May 27, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93dq-8cfn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0010

Public comment 9. Individual. J Potosky. 5-27-18

Submitter Information

Name: Joe Potosky

General Comment

Private individuals who travel abroad with personally owned firearms for lawful purposes such as hunting or competition requirement to document the "export" through an official website designed for commercial exporters.

///

Oppose (serves no useful purpose).

PUBLIC SUBMISSION

As of: 5/30/18 10:24 PM
Received: May 27, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93dw-rqzt
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List

Document: BIS-2017-0004-0011

Public comment 10. Anonymous. 5-27-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I do not think that we should make it easier to export firearms from the United States. We do not need to provide more weapons to people overseas, who then have the potential to hurt us or our allies with them. Please leave the current rules in place, whereby firearm exports need to go through the State Department.

PUBLIC SUBMISSION

As of: 6/1/18 3:20 PM
Received: May 28, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93en-381h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0012

Public comment 11. Individual. D Brach. 5-27-18

Submitter Information

Name: David Brach

General Comment

These new proposed rules are a good start, but please make it easier for people to travel abroad with weapons for hunting or competition. Also, please make it easier on suppressor manufacturers by changing them to non military.

PUBLIC SUBMISSION

As of: 5/30/18 10:34 PM
Received: May 29, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93f8-ndv2
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0013

Public comment 12. Individual. M Holliday. 5-28-18

Submitter Information

Name: Michael Holliday

Address:

P.O. Box 1269
12482 Dalton Trail
Lusby, MD, 20657

Email: wolfdad@comcast.net

Phone: 301-373-0141

General Comment

I take issue with the use of the term "assault weapons" or "close assault weapons." Without a definitive explanation, the terms should not be used. The terms have been made a modern slang way of describing any number of semi-automatic firearms and the term has become a negative. Please use the term "semi automatic" rifles, pistols or other firearm.

PUBLIC SUBMISSION

As of: 5/30/18 10:38 PM
Received: May 29, 2018
Status: Posted
Posted: May 30, 2018
Tracking No. 1k2-93f9-yegq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0014

Public comment 13. Anonymous. 5-29-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I fully support to proposed rule to change how articles the President determines no longer warrant control under United States Munitions List (USML) Category I Firearms, Close Assault Weapons and Combat Shotguns; Category II Guns and Armament; and Category III Ammunition/Ordnance would be controlled under the Commerce Control List (CCL). This proposed rule is being published simultaneously with a proposed rule by the Department of State that would revise Categories I, II, and III of the USML to describe more precisely the articles warranting continued control on that list.

This improvement to US regulations will help legitimate commerce and to help the competitiveness of American companies in international trade.

Thank you for the opportunity to support this important change to Federal regulations.

PUBLIC SUBMISSION

As of: 5/31/18 8:31 AM
Received: May 29, 2018
Status: Posted
Posted: May 31, 2018
Tracking No. 1k2-93fa-ipto
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0015

Public comment 14. Individual. W Hangen. 5-29-18

Submitter Information

Name: WILLIAM HANGEN

General Comment

I support the proposed rule as written, but with a few minor changes:

1) the referenced magazine capacity restriction of 50 rounds should be doubled, to 100 rounds. There are several magazine manufacturers in the United States producing magazines of greater than 50 rounds that would benefit from this change, and such manufacture and enabling technology for magazines greater than 50 rounds is found worldwide. Limiting this magazine capacity to 50 rounds does not protect any special US or allied military advantage, but magazines of greater than 50 rounds are commonly found worldwide. Drum type magazines for the Kalashnikov family of weapons are a prime example.

2) the proposed rule does not address sound suppressors. Sound suppressors are readily available in the US and overseas, and the technical know-how to produce them is found worldwide. There are a plethora of US manufacturers fabricating sound suppressors that would benefit from this rule change, and the use of sound suppressors does not confer any special US or allied military advantage. Inclusion of sound suppressor deregulation would benefit US manufacturing interests without harming our military position.

3) the proposed rule does not address the currently onerous requirement that hunters and recreational shooters document an exportation of their firearms when leaving the country through a website clearly designed for commercial-level export firms. Such regulations do exceedingly little to protect US interests abroad, while unduly burdening hunters and sport shooters with unnecessary red tape and government interference. Repeal of such current regulation would not only ease the burden on law-abiding recreational marksmen, but it would reduce cost and overhead on the government side of the equation as well.

Thank you for your time and attention regarding this matter. Have a great day!

PUBLIC SUBMISSION

As of: 5/31/18 8:38 AM
Received: May 29, 2018
Status: Posted
Posted: May 31, 2018
Tracking No. 1k2-93fb-jsuf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0016

Public comment 15. Individual. J Sammur. 5-29-18

Submitter Information

Name: Jennie Sammur

Address:

tampa, FL,

Email: jsammur@mail.usf.edu

General Comment

Recent mass shootings have re-energized the Gun Control movement for political purposes and vanishment of all guns will be the goal to prevent this tragedy from happening again having as the ultimate goal the elimination of the Second Amendment.

However, the good initiative of addressing the high rate of gun violence in the Nation should be supported. We want resources and solutions put in place that will work. However, eliminating the Constitutional Amendment is not the solution. Creating laws and regulations together with enforcement of such is a starting point. There is no need for civilians and non law enforcement related people to carry AR, AK, MG or any type of automatic firearm.

I am a gun owner who fully supports the proper regulation, registration. A full licensing process before anyone can even own a gun should be required(regulation and policy). President Trump together with a group of representatives with various perspectives including Sportsman and Hunting Organizations, Anti-Gun Advocates, NRA, Law Enforcement, etc. establish guidelines. To structure the various federal and state laws/regulations which are too many so it can be narrowed down and all states would abide by it.

PUBLIC SUBMISSION

As of: 5/31/18 9:02 AM
Received: May 29, 2018
Status: Posted
Posted: May 31, 2018
Tracking No. 1k2-93fc-e3qm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0017

Public comment 16. Anonymous. 5-29-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I would propose no longer than a 90 day Delayed effective date for proposed rule 83 FR 24166 "Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List".

Many small businesses stand to benefit from this proposed rule, especially if they do not import or export at all, only manufacture. All other systems checks are in place to regulate the manufacture of non-imported and non-exported firearms, through the ATF.

PUBLIC SUBMISSION

As of: 5/31/18 9:07 AM
Received: May 30, 2018
Status: Posted
Posted: May 31, 2018
Tracking No. 1k2-93fr-9nra
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0018

Public comment 17. Individual. Ted Reutenik. 5-30-18

Submitter Information

Name: Ted Ruetenik

Address:

46 Liberty Street

Newburyport, MA, 01950

Email: truetenik@hotmail.com

Phone: 978-463-2525

General Comment

The proposal to move the responsibility for overseas gun sales from the State Department to the Commerce Department is a bad idea. Stopping guns, especially assault weapons, from getting into the wrong hands should be a top priority. Immigration to this country is already spurred on by violent drug gangs in Central America. Easing the sale of more weapons will only further the immigration and drug problems. The guns could also be used against American soldiers in future combat situations.

There is only one goal of this proposal. That is, to help the gun companies sell more guns. The potential overall costs of expanded violence and illegal immigration have not been considered. The lack of a moral compass should bother anyone involved with this issue.

PUBLIC SUBMISSION

As of: 5/31/18 9:12 AM
Received: May 30, 2018
Status: Posted
Posted: May 31, 2018
Tracking No. 1k2-93fr-h0gz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0019

Public comment 18. Individual. A Haley. 5-30-18

Submitter Information

Name: Allan Haley

Address:

391 Central St.

Georgetown, MA, 01833

Email: allan.haley@monotype.com

Phone: 617-957-8127

General Comment

President Trumps New Proposal for easing restrictions on overseas gun sales is counter the well-being of American citizens. It would accelerate gun sales to Mexican and Central American violent gangs creating more violence in these countries. This would spur more immigration to the US. In addition, along with increased drug gang power would come more illegal drugs flowing into the US.

This proposal is a bad idea.

PUBLIC SUBMISSION

As of: 6/1/18 3:06 PM Received: May 31, 2018 Status: Posted Posted: June 01, 2018 Tracking No. 1k2-93gd-pdjs Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0020

Public comment 19. Individual. J Mouradian. 5-31-18

Submitter Information

Name: Judy Mouradian

Address:

46 Liberty Street

Newburyport, MA, 01950

Email: jmouradian@hotmail.com

Phone: 9784632525

General Comment

I am appalled that this administration is proposing that responsibility for overseas gun sales move from the State Department to the Commerce Department. There is only one purpose for this - to ease restrictions on overseas gun sales - helping U.S. gun manufacturers to sell more guns. The outcome would be catastrophic. These guns would be sold to the very countries that already breed violent drug gangs, causing their citizens to flee to the U.S. Do we really want to spread the gun violence that is happening in our country to other countries? Do we want to create more deaths and drug trafficking? Do we want to create more homeless refugees? This is a lose-lose situation for everyone except gun manufacturers and the NRA. Please stop this horrible proposal!

PUBLIC SUBMISSION

As of: 6/1/18 3:09 PM
Received: May 31, 2018
Status: Posted
Posted: June 01, 2018
Tracking No. 1k2-93gj-6534
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0021

Public comment 20. Individual. K R Davis. 5-31-18

Submitter Information

Name: Kermit R. Davis

Address:

386 Licklog Ridge
Hayesville, 28904

Email: krd226@bellsouth.net

Phone: 8283894276

General Comment

I am totally against any rule under the United States Munitions List that would allow increased gun sales from United States companies to overseas buyers. There is already too much violence and killing in the world involving guns. The United States government should not be involved in promoting gun sales overseas.

Thank you.

PUBLIC SUBMISSION

As of: 6/1/18 3:12 PM
Received: May 31, 2018
Status: Posted
Posted: June 01, 2018
Tracking No. 1k2-93go-w4zz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0022

Public comment 21. Individual. D Tetrick. 5-31-18

Submitter Information

Name: David Tetrick

General Comment

Making it easier to export weapons of war is a terrible idea. Keep control of these weapons and munitions as they are at present, and maintain that close watch over companies and corporations that would seek to arm militaries and paramilitaries around the world regardless of whether their interests align with those of the United States.

PUBLIC SUBMISSION

As of: 6/4/18 7:14 AM
Received: June 02, 2018
Status: Posted
Posted: June 04, 2018
Tracking No. 1k2-93hm-m9v2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List

Document: BIS-2017-0004-0023

Public comment 22. Individual. J Ruetenik. 6-2-18

Submitter Information

Name: Jim Ruetenik

General Comment

Please do not export our violence. It is bad enough that we export lung disease and diabetes. Stop the export of lethal weapons such as guns. They will be used against Americans in those countries.

PUBLIC SUBMISSION

As of: 6/4/18 7:20 AM
Received: June 03, 2018
Status: Posted
Posted: June 04, 2018
Tracking No. 1k2-93im-ba4e
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0024

Public comment 23. Anonymous. S. Anonymous. 5-29-18

Submitter Information

Name: Shay Anonymous

General Comment

I agree with and support this rules change. While there are definitely items that need to be export-controlled in order to maintain our technological advantages over others and prevent them from falling into enemy hands, most small arms do not fall into that category. Small arms and ammunition are a well-understood and mature technology, removing them from the USML reduces the monetary burden on importers and exporters of firearms and ammunition without endangering the United States or its people. Furthermore, it could open up new markets to smaller manufacturers, which is good for the industry.

PUBLIC SUBMISSION

As of: 6/5/18 3:14 PM
Received: June 04, 2018
Status: Posted
Posted: June 05, 2018
Tracking No. 1k2-93j9-dn8r
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0025

Public comment 24. Anonymous. 6-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Do not remove important export controls on non-military firearms, including handguns, semiautomatic assault rifles like the AR-15, and .50-caliber sniper rifles from your control. This change could (open) up a lot more risk and a lot more opportunity for illegal and illicit trafficking. A loosening of controls may also make it harder to identify and prosecute arms smugglers and illegal exporters.

The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more. The rule would seek to legitimize semiautomatic assault rifles as civilian products when they are, clearly, battlefield weapons.

This makes no sense at all. I object!

PUBLIC SUBMISSION

As of: 6/5/18 3:18 PM
Received: June 04, 2018
Status: Posted
Posted: June 05, 2018
Tracking No. 1k2-93jb-re3p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List

Document: BIS-2017-0004-0026

Public comment 25. Individual. K Koupal. 6-4-18

Submitter Information

Name: Ken Koupal

General Comment

Please don't export arms and ammunition. Don't supply terrorists, foreign or domestic.

PUBLIC SUBMISSION

As of: 6/5/18 3:21 PM
Received: June 04, 2018
Status: Posted
Posted: June 05, 2018
Tracking No. 1k2-93jc-ce49
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0027

Public comment 26. Individual. R Clemans. 6-4-18

Submitter Information

Name: Robert Clemans

Address:

6494 Lone Eagle Rd
Golden, CO, 80403-8122

Email: rjclemans@wildblue.net

Phone: 3037621758

Organization: DBA Robert John Clemans

General Comment

I agree with and support this rules change. As an arms dealer these changes will reduce my prices and therefore what I charge.

PUBLIC SUBMISSION

As of: 6/15/18 10:55 AM
Received: June 07, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-9316-ok7c
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0028

Public comment 27. Individual. P Hiller. 6-7-18

Submitter Information

Name: Patrick Hiller

General Comment

Dear Ladies and Gentlemen,

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. Regarding wide retail availability of firearms, about which comment has been requested, many countries, including Mexico, prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.
3. National brokering laws are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.
4. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.
5. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.
6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing

weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

8. The proposed change will reduce transparency and reporting on gun exports.

9. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 6/15/18 10:59 AM
Received: June 09, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93md-injf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0030

Public comment 29. Individual. J Sorensen. 6-9-18

Submitter Information

Name: Jamie Sorensen

General Comment

Please try to simplify regulations for good people trying to do the right thing. We are so overburdened with regulations now we can't see over the top. 99% of the regulations do nothing to stop the bad guys. They just harass the good people.

PUBLIC SUBMISSION

As of: 6/15/18 11:05 AM
Received: June 09, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93me-cv1w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0031

Public comment 30. Individual. W Bunyea. 6-9-18

Submitter Information

Name: Walter Bunyea

General Comment

I agree completely!

An annual registration fee that manufacturers of defense items must pay, whether or not they export their products is simply unjustifiable. Please end this bad practice as soon as you can.

Applying the regime to private travelers/hunters is just bizarre. So, please end this practice as well.

Finally, and most importantly, please put an end to any harassing or censorship of firearm instructors within the U.S, bloggers, writers, and those posting online guides or tutorials discussing "technical data" about defense items. This seems to be a clear violation of our First Amendment right to free speech. So, I urge you to cease these activities immediately.

Promote free commerce and protect our rights at home and abroad.

Thank you for your consideration of our basic liberties.

PUBLIC SUBMISSION

As of: 6/15/18 11:08 AM
Received: June 09, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93mh-f00a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0032

Public comment 31. Individual. R Williams. 6-9-18

Submitter Information

Name: Roy Williams

General Comment

"BIS will also take into consideration any public comments submitted on this aspect of the proposed rule regarding imposing an EEI filing requirement in AES, as well as comments on the current practice of using the CBP Form 4457, as well as any other suggestions on alternative approaches for tracking such information.

Travelers leaving the United States temporarily would be required to declare the 0A501 and 0A505 items to a CBP officer prior to departure from the United States and present the firearms, parts, components, accessories, attachments, and ammunition they are exporting to the CBP officer for inspection, confirming that the authority for the export is License Exception BAG, that the exporter is compliant with its terms. "

As a competitive pistol shooter and current member of the US National Team that travels several times a year to international competitions, the 4457 system works and additional complication is unnecessary and burdensome.

Requiring travelers to present items to CBP each trip heavily impacts travelers beginning journeys from locations that do not have fully-staffed CBP offices and interrupting a journey to present items at a port of entry will induce delays, be problematic and could lead to the traveler breaking state and local laws by taking possession of firearms for the purpose of inspection on departure (eg: California prohibits individual possession of firearms and parts otherwise legal to check-through from Wyoming in checked baggage.). Even in locations with CBP offices, completion of a 4457 can require appointments and take several hours if officers are otherwise engaged.

Presenting unserialized items such as "ammunition, parts, components or accessories" in advance of travel would still be burdensome to travellers far from CBP facilities as well as wasteful, meaningless and largely unenforceable.

PUBLIC SUBMISSION

As of: 6/15/18 11:15 AM
Received: June 09, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93mi-rvov
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0033

Public comment 32. Friar Arms. J Friar. 6-9-18

Submitter Information

Name: James Friar

Address:

544 Milford Rd
unit 26
Swansea, MA, 02777

Email: friararms@comcast.net

Phone: 7745261713

General Comment

Please change the rule. I am a gunsmith in Massachusetts starting out on my own. I make Competition pistols by hand one at a time. This tax has made it so I have to make and sell pistols faster than I possibly can to realize any profit. This tax is barely noticeable to major manufacturer and prevents me from competing in the market place. Thank you for the opportunity to comment.

James Donald Friar
Friar Arms
Swansea MA

PUBLIC SUBMISSION

As of: 6/15/18 11:19 AM
Received: June 09, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93mq-6e1j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0034

Public comment 33. Individual. C Berry. 6-9-18

Submitter Information

Name: Chris Berry

General Comment

I support the administration's efforts to remove these needlessly burdensome and unproductive requirements and regulations related to the exportation of certain classes of firearms, accessories and other parts. Americans are best served by free market trade and benefit from any effort to move towards an environment that fosters economic activity. The arguments for regulations that hinder free trade take many forms, but firearm regulations arouse a vigor in the opposition scarcely seen in other industries. Regardless of ones beliefs about guns, regulations like these do little to serve the proponents intended purpose, but do have a very real negative impact on American businesses and workers.

I have significant disagreement with the Trump administration with regard to the use of tariffs, quotas and cherry picking businesses for noncompetitive government support. However, I am proud of efforts like these that serve as a model to other countries about the mutual benefit of economic freedom.

PUBLIC SUBMISSION

As of: 6/15/18 11:23 AM
Received: June 10, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93n3-chk9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0035

Public comment 34. Individual. H Blake. 6-10-18

Submitter Information

Name: Henry Blake

General Comment

The items to be opened for export are currently freely manufactured in many parts of the world. Not only will our businesses prosper if we engage in this traffic but we will improve our knowledge and capability. To address the fears of some of the commentators, a disproportionately armed world will result in nothing more than the crushing defeat of the weak. We should help those people help themselves.

HLB

PUBLIC SUBMISSION

As of: 6/15/18 11:27 AM
Received: June 10, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93nd-uh8e
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0036

Public comment 35. Individual. S German. 6-10-18

Submitter Information

Name: Stephen German

Address:

840 Washington St.
Lamont, IA, 50650

Email: sjgerman@iowatelecom.net

General Comment

gunsmiths and gunsmiths that are manufacturers but do no actual exporting should be exempt from ITAR regulations. They are just trying to make a living. They do not make a lot of money and are unduly burdened by the extra fees. It is just a back door way of gun control.

PUBLIC SUBMISSION

As of: 6/15/18 11:31 AM
Received: June 11, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93ns-7coz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0037

Public comment 36. Individual. D Youkilis. 6-11-18

Submitter Information

Name: Daniel Youkilis

Address:

6696 Fair Oaks Dr.
Cincinnati, OH, 45237

Email: dyouk777@gmail.com

General Comment

As a close relative of someone murdered by an AR-15, I know that semi-automatic assault rifles have no civilian purpose. This proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. These are weapons of war and their only civilian purpose is carnage. They must not be transferred to the Commerce Department control where they would not be given proper oversight.

PUBLIC SUBMISSION

As of: 6/15/18 11:37 AM
Received: June 11, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93nv-p383
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List

Document: BIS-2017-0004-0038

Public comment 37. Individual. L Ward. 6-11-18

Submitter Information

Name: Logan Ward

General Comment

We need to get rid of all firearms regulations. Because firearms regulations do nothing to stop or prevent violence.

PUBLIC SUBMISSION

As of: 6/20/18 4:32 PM
Received: June 04, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93jd-fa1w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0052

Public comment 38. Anonymous. 6-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane.

PUBLIC SUBMISSION

As of: 6/15/18 11:47 AM
Received: June 14, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93pp-i66b
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List

Document: BIS-2017-0004-0040

Public comment 39. Individual. N Logan. 6-14-18

Submitter Information

Name: nan logan

General Comment

I am concerned that international gun sales might be prosscessed through commerc rather than State. Please do what youcan to keep these sales under the State Department's perview.

PUBLIC SUBMISSION

As of: 6/15/18 11:56 AM
Received: June 14, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93pq-tol6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0041

Public comment 40. Individual. H Fox. 6-14-18

Submitter Information

Name: Heidi Fox

Address:
MA,

General Comment

I am in strong opposition to the proposed changes to the United States Munitions List. I was alerted to this proposed rule change by organizations who advocate for sensible gun control legislation domestically. Until we can agree on the definition and categorization of weapons designed for mass destruction and control their production and use domestically, we should not be modifying rules for the oversight of arms manufactured and distributed internationally. These rule changes are one of many ways that ordinary citizens who advocate for broader and stricter gun control are undermined by special interests who know where to target their efforts to relax the definition of weapons designed for war. In light of the recent efforts by the Justice Department to limit those seeking asylum from dangers in their homeland, the change in the rules is as much an immigration issue as it is an arms control issue.

PUBLIC SUBMISSION

As of: 6/15/18 12:06 PM
Received: June 14, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93pw-pup8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0042

Public comment 41. Amnesty International USA. A Akwei. 6-14-18

Submitter Information

Name: Adotei Akwei

Address:

600 Pennsylvania Avenue SE
Suite 500
Washington, DC, 20003

Email: aakwei@aiusa.org

Phone: 2025098148

General Comment

Please find attached Amnesty International USA's concerns with the proposed changes to CATI-III

Adotei Akwei

Deputy Director Advocacy and Government Relations
Amnesty International USA

Attachments

Amnesty International USA Comments on CATI-III 06142018



DATE: June 14, 2018

TO: Directorate of Defense Trade Controls
U.S. Department of State
DDTCPublicComments@state.gov

and

Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

FROM: Adotei Akwei, Amnesty International USA, Washington DC

I am writing on behalf of Amnesty International-USA to comment on proposed changes to the *International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III* issued by the Department of State and proposed regulations for the *Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)*, both of which were published in the Federal Register on May 24, 2018.

As a global civil society organization focused on the promotion and protection of human rights, Amnesty International does not oppose the arms trade per se but calls for strong legally-binding controls to prevent arms being used for serious violations of international human rights and humanitarian law. We do document

the human rights impact of the irresponsible arms trade, raising concerns or calling for specific transfers that pose significant human rights risks to be halted.

Our comments and questions about the proposed changes to International Traffic in Arms Regulations and the Export Administration Regulations, thus, are all conveyed with potential human rights consequences in mind. In particular, we are concerned that some of the proposed changes weaken existing controls on transfers, increasing the risk that irresponsible brokers of small arms and light weapons could evade regulation, and arms will be diverted to states or non-state actors with poor human rights records. There is further risk of undermining US laws restricting transfers to foreign military units that have committed gross violations of human rights. Amnesty International has for many years called attention to the risks associated with untrammelled export of small arms and light weapons around the world. These arms have been associated with the deployment of child soldiers and the rise of insurgent groups. They are easier to divert than larger weapons and often end up in the illicit market.

The proposed changes to Categories I-III of the ITAR introduced as part of the Export Control Reform Initiative would transfer some specific and completely operable military-style semi-automatic weapons from the USML to the CCL and thereby affect some statutory controls on what are now considered defense articles. We do not believe that the line drawn between automatic and semi-automatic is as clear as the proposed regulations would suggest, and accordingly we are concerned that the changes would significantly diminish Congressional oversight of the transfer of these weapons.

Below we have elaborated and itemized our concerns for each set of proposed changes.

Comment on changes to ITAR proposed by Department of State and relevant to the changes proposed for the EAR/CCL.

1. Our principal concern here is with the risk of proliferation and diversion that could be exacerbated by the transfer of semi-automatic weapons to the CCL from the USML, where such weapons currently meet the statutory definition of “defense article” and are subject to a number of oversight mechanisms. The term “defense article” is used explicitly in several statutes to require controls on brokering, Congressional notification, and inclusion of an item on the US Munitions Import List controlled by the Bureau of Alcohol, Tobacco and Firearms. In addition, semi-automatic weapons are currently included as defense articles in Directorate of Defense Trade Control’s annual 655 report and are currently included, as defense articles, in the definition of security assistance (22USC 2014 and 22 USC 2304). The explanatory text accompanying the rules proposed by the State Department did not comment on the ancillary effect of removing semi-automatic weapons from the USML, but the implied changes are of concern to us. Several of these concerns are elaborated below.
2. Brokering Laws. The proposed changes to Categories I, II and III mean that brokers of semi-automatic weapons and related ammunition will be exempt from registration and licensing that is currently triggered by their inclusion as defense articles on the USML. On many occasions over the past two decades, human rights advocates have called attention to national brokering laws as a weak link in the chain of efforts to curtail illicit market transfers of small arms and light weapons. [See Amnesty International’s 2010 report, “[Deadly Movements](#).”]

Since 1996, US brokering laws have been seen among the strongest in the world. They apply to US agents wherever they are located as well as to foreign nationals operating from within the US; and they cover the full range of facilitating activity—including finance, insurance, transport and

trans-shipment (freight-forwarding). The US statutory provisions on brokering are robust, but their application is directly and specifically linked to the USML. Regulatory authority over brokers in the Export Administration Regulations that house the CCL is without a clear statutory basis. Consequently, we are concerned that moving semi-automatic weapons and related ammunition to the CCL – and simultaneously *removing* them from the USML – will lead to the US government relinquishing its regulatory authority over brokers of these weapons. This is of particular concern because many of the proposed changes to Categories I-III pertain to completely operable weapons or ammunition, and not simply components or software.

We agree with [the State Department](#)'s past assessment that establishing controls over brokering activity is a major step towards blocking unauthorized and illicit arms transfers that have fueled so many conflicts and serious human rights violations around the world. In some [well-known cases](#), states have been unable to prosecute notorious arms traffickers because local brokering laws were insufficiently robust. We strongly support the current requirement for arms brokers to be registered and licensed before arranging deals to transfer these small but still deadly weapons. For that reason, we oppose transferring semi-automatic weapons and ammunition to the CCL until and unless the continuing application of this requirement can be assured.

3. The proposed changes do not appear to be in line with established Wassenaar Categories I-III. Semi-automatic weapons are included in Wassenaar ML1 explicitly as munitions, with exceptions for smooth bore weapons used in hunting and sporting. From descriptions in the Wassenaar Munitions List, it seems clear that the intention was to differentiate between military and security items, on one hand, and dual-use items on the other. Semi-automatic weapons used by peacekeepers, military, and

police are intended to be controlled as munitions. The proposal to move semi-automatic firearms and large caliber rifles to the 500-series on CCL does not appear to be in line with this designation.

Moreover, we are concerned that the proposed changes may result in increased circulation of plans for non-automatic weapons produced by 3D printing technology, and this may be at odds with Wassenaar expectations, at least with regards to Wassenaar Best Practices Guidelines on Small Arms and Light Weapons. We are concerned about possible weapons proliferation from 3D printing. We took note of the well-publicized 2012 case where the State Department invoked ITAR (and by extension the USML) to oblige a manufacturer to remove plans for a 3D printable gun from the internet. The Fifth Circuit Court upheld the State Department's view that the device in question was a "defense article" covered by ITAR, but we are concerned that the case might have ended differently if the 3D gun were considered a CCL-500 item rather than a defense article included on the US Munitions List. From our perspective, this story illustrates the grave dangers of uncontrolled arms proliferation. The combination of internet dissemination and do-it-yourself 3D production is problematic in that the government has no knowledge of or control over the producer or end-user or the purpose to which the weapons will be put. Permitting such transactions would be a significant step backwards in normative development and contrary to US policy over past 25 years.

4. Registration and End Use Controls (Blue Lantern). The fact that manufacturers (and brokers) of semi-automatic weapons would no longer be required to register before applying for a license presents an additional concern. As we understand it, registration documents often provide regulators with important information during the licensing phase, and we are concerned that under the new rules the regulators at Commerce would not have access to the same background information that DDTC now uses

in the early stages of its monitoring and investigation. Moreover, we are concerned that Blue Lantern investigations would exclude transfers of semi-automatic weapons.

5. Waiting period before implementation. A sufficient amount of time should be allowed for Congress to enact statutory changes to address gaps noted above.

Additional comments on CCL rules proposed by Department of Commerce.

6. It appears that the new 500-series number would add specificity to reports required by the UN and the Wassenaar Arrangement, and that would be welcome. However, Amnesty International has concerns about changing the designation of semi-automatic weapons so as to exclude them from consideration as “defense articles,” elaborated in comments to the State Department above.
7. While some of the weapons that are proposed for inclusion on the CCL are commercially available in the US, that is not the case globally and – increasingly—state governments in the US seek to limit their sale. In recent months many commercial outlets have discontinued sales of semi-automatic assault weapons, and the proposed rule goes in the opposite, and wrong, direction. Seventeen American states have proposed a total of 56 bills to regulate or ban the sale of assault weapons in the 2018 legislative season.

8. Amnesty International generally supports strong oversight measures for arms transfers and from that perspective, we welcome detailed digital record-keeping requirements (serial number, model, caliber, and manufacturer) and increased enforcement of end-use controls. However, given the increase in license applications shifted to Commerce combined with the absence of information currently gained through the registration procedure, we are concerned at the likelihood that increased workload without commensurate resources will actually result in less oversight than at present under authority of the State Department.

Thank you for your attention to our concerns.

Sincerely,



Adotei Akwei

Deputy Director Advocacy and Government Relations

Amnesty International USA

600 Pennsylvania Avenue SE Suite 500

Email: aakwei@aiusa.org

Tel: (202) 509-8148

PUBLIC SUBMISSION

As of: 6/15/18 12:30 PM
Received: June 15, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93qg-o4lc
Comments Due: July 09, 2018
Submission Type: Unknown

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0043

Public comment 42. Individual. L Hageman. 6-11-18

Submitter Information

General Comment

See Attached

Attachments

Public comment 42. Individual. L Hageman. 6-11-18

Regulatory Policy Division-Ref RIN 0694-AF47

We fully support the proposed ruling and thank you for your attention to this matter.

L.A. Hagemann
519 Turnstone Drive
Durham NC 27703



Received by BIS on 5/11/18

PUBLIC SUBMISSION

As of: 6/15/18 1:24 PM
Received: June 15, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93qh-hb73
Comments Due: July 09, 2018
Submission Type: Unknown

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0044

Public comment 43. Individual. E Williams. 6-5-18

Submitter Information

Name: Erik Williams

General Comment

See Attached

Attachments

Public comment 43. Individual. E Williams. 6-5-18

Erick Williams
1209 Old Hickory
East Lansing, MI 48823

5 June 2018

Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
14th Street and Pennsylvania Avenue, NW,
Washington, DC 20230

Re: RIN 0694-AF47

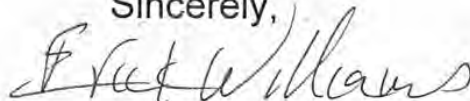
Greetings:

I am opposed to the proposed rule relaxing export controls on military-style weapons.

Please consider police officers, especially those in allied countries. Police officers do their work in the community, not behind the perimeters of military bases. In some troubled communities, officers are targeted by armed groups using weapons purchased on the small arms market. In some countries (like Pakistan) police officers die at a higher rate than soldiers.

The last thing we need is more .50-caliber sniper rifles being sold to terrorists. Please reconsider this rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Erick Williams", written in a cursive style.

Erick Williams

PUBLIC SUBMISSION

As of: 6/15/18 1:36 PM
Received: June 15, 2018
Status: Posted
Posted: June 15, 2018
Tracking No. 1k2-93qh-6j3w
Comments Due: July 09, 2018
Submission Type: Unknown

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List

Document: BIS-2017-0004-0045

Public comment 44. Individual. B Root. 6-11-18

Submitter Information

General Comment

See Attached

Attachments

Public comment 44. Individual. B Root. 6-11-18

June 11, 2018

From: Bill Root, billroot23@gmail.com; tel 517 333 8707
To: DDTCPublicComments@state.gov; and
BISPublicComments@bis.doc.gov

Subject: ITAR Amendment Categories I, II, and III and
Related EAR Amendment RIN 0694-AF47

These comments relate the combined ITAR and EAR amendments to USG commitments to multilateral controls. Each of 33 numbered topics is listed in the order that topic appears in the Wassenaar Munitions List (WML). It is then subdivided into three parts, with the following number of examples:

- a 27 US and multilateral texts are either identical or substantially equivalent;
- b 74 US controls omit what WML controls (or WML omits US decontrols); and
- c 165 WML omits what US controls (or US omits WML decontrols).

Part b should either be added to US controls or the US should seek removal from WML controls. Part c should either be deleted from US controls or be proposed by the US to be added to WML.

These three parts omit second order impacts. For example, the number of differences between WML and US would increase exponentially if each difference in a weapon item was counted again when tallying the differences for ammunition, each of the types of components, production equipment, software, and technology related to that weapon difference.

The above a,b,c differences omit 16 examples of "and specially designed components therefor," which should be deleted from the proposed revised USML for consistency with the Export Control Reform intent to transfer insignificant items to the CCL (identified in topic 31 below).

These comments assume deletion of "specially designed" wherever it appears; use of "required" for software and technology; and a definition of "components" to include parts, accessories, attachments, and associated equipment.

1. Caliber

WML 1 Smooth-bore weapons with a caliber of less than 20 mm, other arms and automatic weapons with a caliber of 12.7 mm (caliber 0.50 inches) or less, as follows

Note: WML 1 does not apply to:

- a Firearms for dummy ammunition incapable of discharging a projectile;*
- b Firearms to launch tethered projectiles having no high explosive charge or communications link, to a range of less than or equal to 500 m;*
- c Weapons using non-center fire cased ammunition not fully automatic;*
- d Deactivated weapons*

- a Rifles and combination guns, handguns, machine, sub-machine and volley guns*

Note: WML 1.a does not apply to:

- a Rifles and combination guns, manufactured earlier than 1938;*
- b Reproductions of rifles and combination guns, the originals of which were manufactured earlier than 1890;*
- c Handguns, volley guns and machine guns, manufactured earlier than 1890 and their reproductions;*
- d Rifles or handguns to discharge an inert projectile by compressed air or CO₂.*

- b Smooth bore weapons as follows::*

- b1 for military use*
- b2 other smooth-bore weapons as follows:*
- b2a fully automatic;*
- b2b semi-automatic or pump-action*

Note: WML 1.b.2 does not apply to weapons to discharge an inert projectile by compressed air or CO₂

Note: WML 1.b does not apply to:

- a Smooth-bore weapons manufactured earlier than 1938;*
- b Reproductions of smooth-bore weapons, the originals of which were manufactured earlier than 1890;*
- c Smooth-bore weapons used for hunting or sporting purposes. These weapons must not be for military use or of the fully automatic firing type;*
- d Smooth-bore weapons for:*
- d1 Slaughtering of domestic animals;*
- d2 Tranquilizing of animals;*
- d3 Seismic testing;*
- d4 Firing of industrial projectiles; or*
- d5 Disrupting Improvised Explosive Devices (IEDs).*

N.B. For disruptors, see WML 4 and I.A.6 on the Dual-Use List.

WML 2 Smooth-bore weapons with a caliber of 20 mm or more, other weapons or armament with a caliber greater than 12.7 mm (caliber 0.50 inches), projectors ... as follows

a Guns, howitzers, cannon, mortars, anti-tank wapons, projectile launchers, ... rifles, recoilless rifles, smooth-bore weapons ...

Note 2: WML 2.a does not apply to weapons as follows:

a *Rifles, smooth-bore weapons and combination guns, manufactured earlier than 1938;*

b *Reproductions of rifles, smooth-bore weapons and combination guns, the originals of which were manufactured carlier than 1890;*

c *Guns, howitzers, cannons, mortars, manufactured earlier than 1890;*

d *Smooth-bore weapons used for hunting or sporting purposes. These weapons must not be for military use or of the fully automatic firing type;*

e *Smooth-bore weapons for any of the following:*

e1 *Slaughtering of domestic animals;*

e2 *Tranquilizing animals;*

e3 *Seismic testing;*

e4 *Firing of industrial projectiles;*

e5 *Disrupting Improvised Explosive Devices (IEDs);*

NB *For disruptors, see WML 4 and 1.A.6 on the Dual-Use List.*

USML I.b Fully automatic firearms to .50 caliber (12.7 mm) inclusive

USML I.d Fully automatic shotguns regardless of gauge.

USML II.a Guns and armament greater than .50 caliber (12.7 mm), as follows:

a1 Guns, howitzers, artillery, and cannons;

a2 Mortars;

a3 Rexoilolless rifles;

a4 Grenade launchers; or

a5 Development guns and armament greater than .50 caliber (12.7 mm) funded by DOD

Note 1: a5 does not control greater than .50 caliber

a *in production;*

b *subject to EAR; or*

c *being developed for both civil and military applications*

Note 2: Note 1 to a5 does not apply to USML items, whether in production or deve;lopment.

- 0A501.a Non-automatic and semi-automatic firearms of caliber less than or equal to .50 inches (12.7 mm)
- 0A501.b Non-automatic and non-semi-automatic rifles, carbines, revolvers, or pistols with a caliber greater than .50 inches (12.7 mm) but less than or equal to .72 inches (18.0 mm)
- 0A602.a Guns and armament manufactured between 1890 and 1919.

1a Caliber US identical to WML

- 1-5 WML 2.a/USML II.a1-3 guns, howitzers, cannon, mortars, and recoilless rifles greater than .50 caliber

1b Caliber US Omissions from Multilateral Controls

- 1 US omits WML 1 semi-automatic smooth bore caliber from 12.7 mm to 20 mm.
- 2 US omits WML non-automatic smooth bore caliber from 18 mm to 20 mm.
- WML 2a rifles greater than .50 caliber is broader than:
- 3 0A501.b, which is limited to non-automatic and non- semi-automatic rifles, carbines, revolvers, or pistols between caliber .50 and .72; and
- 4,5 USML II.a5 (and Notes 1 and 2) which applies to developmental guns funded by DOD but not if in production or being developed for both civil and military application;
- 6-10 US omits explicit WML 1.a mention of combined guns, handguns, machine, sub-machine and volley guns
- WML covers more than US by the following differences in decontrols in:
- 11 WML 1a Note b or 1b2 Note vs. Note 1 to 0A501
(Rifles or handguns) (weapons) specially designed to discharge an inert projectile by compressed air or CO2 omit portions of BB guns, pellet rifles, paint ball, and all other air rifles
- 12-14 WML 1b Note a and b and 2a Note 2 a and b vs. 0A501 Note 1
- a (Smooth bore weapons) (Rifles, smooth-bore weapons and combination guns) manufactured earlier than 1938;
- b Reproductions of (smooth-bore weapons) (rifles, smooth-bore weapons and combination guns), the originals of which were manufactured earlier than 1890 omit portions of "antique firearms manufactured before 1890 and reproductions thereof, muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design"
- 15,16 WML 2.a anti-tank weapons and projectile launchers.

1c Caliber Multilateral Omissions from US Controls

- 1 WML omits USML I(d) fully automatic shotguns more than .50 caliber.
- 2-4 WML omits 0A501.b explicit mention of carbines, revolvers, or pistols
- 5-17 US covers more than WML by omission of decontrols in Notes for WML1, WML 1.a, WML 1.b.2, WML 1.b, including US covers more than WML by the following differences in decontrols in:
 - a 0A501 Note 1 vs. WML 1a Note b or 1b2 Note:
(BB guns, pellet rifles, paint ball, and all other air rifles omit portions of (rifles or handguns) (weapons) to discharge an inert projectile by compressed air or CO2
 - b 0A501 Note 1 plus 0A602.a vs. WML 1b Note a and b:
US decontrol of antique firearms manufactured before 1890 and reproductions thereof, muzzle loading black powder firearms except weapons of a post 1937 design;
 - c 0A602.a guns and armament manufactured between 1890 and 1919 omits portions of WML decontrol of
 - 1 Smooth bore weapons manufactured earlier than 1938;
 - 2 Reproductions of smooth-bore weapons, the originals of which were manufactured earlier than 1890

2. Firearms using caseless ammunition

- WML 1.c weapons using caseless ammunition
- USML 1.a firearms using caseless ammunition

2a Firearms using caseless ammunition substantially equivalent

- 6 WML 1./USML 1.a

3. Firearms to integrate

USML 1.c Firearms to integrate fire control, automatic tracking, or automatic firing

3c Firearms to integrate Multilateral Omissions from US Controls

- 18 WML omits USML 1.c

4. Detachable

WML 1.d detachable cartridge magazines
WML 2.d detachable cartridge magazines

USML III.a7 Ammunition for fully automatic firearms or guns that fire superposed or stacked
projectiles
0A501.d Detachable magazines with a capacity of greater than 16 rounds for 0A501.a or .b

4b Detachable US Omissions from Multilateral Controls

17 WML 1.d and 2.d are broader than USML III.a7 or 0A501.d.

4c Detachable Multilateral Omissions from US Controls

19 WML omits USML III.a7

5. Sound suppressors

WML 1.d ... sound suppressors or moderators ... for WML 1.a, b, c.

USML I.e Silencers, mufflers, and sound suppressors ...

5a. Sound suppressors US Omissions from Multilateral Controls

7 WML 1.d/USML I.e Sound suppressors

5b. Sound suppressors US Omissions from Multilateral Controls

18 WML 1.d Sound moderators

5c. Sound suppressors Multilateral Omissions from US Controls

20 USML I.e Silencers, mufflers

21 USML I.e Sound suppressors for other than USML I

6. Mounts

WML 1.d ... gun mountings for WML 1.a,b,c,

WML 2.c ... weapon sight mounts for military use and for WML.2a;

WML 2.d Mountings ... for WML 2.a,

USML II.h3 ... automatically stabilize aim (other than gun rests).

USML II.j9i Mounts for independently powered ammunition handling systems

0A501.c ... mounting blocks (trunnions) ...

6b. Mounts US Omissions from Multilateral Controls

19-21 WML 1.d, 2.c, 2d are broader than USML II.h3, j9i, and 0A501.c

6c. Mounts Multilateral Omissions from US Controls

22-23 USML II.h3, j9i, and 0A501c omit for I or II or military use.,

7. Optical weapon sights

- WML 1.d ... optical weapon-sights ... for WML 1.a,b,c, except without electronic image processing, with a magnification of 9 times or less, provided not for military use or incorporate any reticles for military use.
- WML 2.c Weapons sights ... for military use and for ML 2.a
- USML II. j2 Sights to orient indirect fire weapons
- 0A501.y3 Iron sights
- 0A504 Optical sighting devices for firearms and components as follows:
- a Telescopic sights;
 - b Holographic sights;
 - c Reflex or "red dot" sights;
 - d Reticle sights;
 - e Other sighting devices that contain optical elements;
 - f Laser aiming devices or laser illuminators for use on firearms, and having an operational wavelength exceeding 400 nm but not exceeding 710 nm, except laser boresighting devices that must be placed in the bore or chamber to provide a reference for aligning the firearms sights.
 - g Lenses, other optical elements and adjustment mechanisms for articles in a,b,c,d,e, or i.
 - i Riflescopes that were not "subject to the EAR" as of (DATE ONE DAY PRIOR TO THE EFFECTIVE DATE OF THE FINAL RULE) and are for use in firearms that are "subject to the EAR."

7b. Sights US Omissions from Multilateral Controls

22,23 WML 1.d and 2.c omit technical limits in USMLII.j2, 0A501.y3, or 0A504.a-i

7c. Sights Multilateral Omissions from US Controls

25-34 USML II.j2, 0A501.y3, and 0A504.a-1 omit WML 1.d for WML 1.a,b,c or WML 2.c for WML 2.a

8. Flash suppressors

- WML 1.d ... flash suppressors
- USML II.e muzzle flash suppression devices

8b. Flash suppressors US Omissions from Multilateral Controls

24 WML 1.d omits USML II.e "muzzle"

9. Flame throwers

WML 2.a ... military flame throwers

USML II.b Flame throwers with a minimum effective range of 20 meters (i.e., whether or not military) plus

0A602.b Military flame throwers with an effective range less than 20 meters

9c Flame throwers Multilateral Omissions from US Controls

35 US is broader by covering non-military with minimum 20m range.

10. Discharge type and administer electric shock

0A503 Discharge type arms, non-lethal or less-lethal grenades and projectiles, ... and devices to administer electric shock

10c. Discharge type and administer electric shock Multilateral Omissions from US Controls

36 WML omits 0A503

11. Signature reduction

WML 2.a ... signature reduction devices for 2.a
USML II.e: Signature reduction devices for II a, b, or d

11a Signature reduction substantially equivalent

8 WML 2.a/USML II.e

12. Liquid propelling charges

WML 2.a Note 1: WML 2.a includes injectors, metering devices, storage tanks and other components for liquid propelling charges for WML 2.a

12b. Liquid propelling charges US Omissions from Multilateral Controls

25-28 US omits WML 2.a Note 1

13. Smoke and flares

WML 2.b Smoke ... projectors or generators for military use

III.d14 Illuminating flares ...
1A984 ... non-irritant smoke flares

13b. Smoke and flares US Omissions from Multilateral Controls

29,30 US omits WML 2.b smoke projectors or generators

13c Smoke and flares Multilateral Omissions from US Controls

37 WML omits III.d14 illuminating flares
28 WML omits 1A984 non-irritant smoke flares

14. Gas

WML 2.b ... gas ... projectors or generators and
WML 7.e Equipment ... for the dissemination of ... chemical agents

USML XIV.f1 Equipment for the dissemination of chemical agents.
1A607.c Equipment for dissemination of riot control agents

14a Gas identical

WML 7.e/USML XIV.f1 and 1A607.c

14b Gas US Omissions from Multilateral Controls

31,32 US omits WML 2.b projectors or generators

15. Pyrotechnic

WML 2.b ... pyrotechnic projectors or generators for military use

USML III.a6 Ammunition employing pyrotechnic material in the projectile base ...
d1 Projectiles that use pyrotechnic tracer materials that incorporate any material
having peak radiance above 710 nm ...;

1A984 ... pyrotechnic articles (excluding shotgun shells, unless the shotgun shells contain
only chemical irritants) having dual military and commercial use;

15b Pyrotechnic US Omissions from Multilateral Controls

WML 2.b is broader than 1A984 because:
33 WML omits US exclusion from pyrotechnic articles; and
34 US crime control reason is less restrictive than US national security reason applied to
other WML- controlled items.

15c Pyrotechnic Multilateral Omissions from US Controls

1A984 is broader than WML 2.b because:
39 articles is broader than projectors or generators; and
40 dual military and commercial use is broader than military use
41,42 pyrotechnic material omitted from WML

16. Signal

WML 2.b Note WML 2.b does not apply to signal pistols
0A503 decontrol arms solely for signal ...use

16b Signal US Omissions from Multilateral Controls

35 0A503 “solely” decontrol is narrower than WML 2.b Note decontrol

17. Kinetic energy

WML III.a Ammunition for weapons specified by ... WML 12
WML 12.a Kinetic energy weapon systems for destruction or effecting mission abort of a target
USML II.d kinetic energy weapon systems for destruction or rendering mission-abort of a target .

WML 12 Note 1.c. WML 12 includes ... target acquisition, tracking, fire control or damage assessment systems

USML II.j15 Kinetic energy weapon target acquisition, tracking fire control, and damage assessment systems

17a Kinetic energy substantially equivalent

10 WML 12.a/USML II.d
11 WML 12 Note 1.c/USML II.j15

18. Metal or plastic

WML 3 Note 1a WML 3 includes metal or plastic fabrications ...

USML III.a5 Ammunition, except shotgun ammunition, based on non-metallic cases, or non-metallic cases that have only a metallic base, which result in a total cartridge mass 80% or less than the mass of a brass- or steel-cased cartridge that provides comparable ballistic performance

d1 Projectiles that use pyrotechnic tracer materials that incorporate any material having peak radiance above 710 nm or are incendiary, explosive, steel tipped, or contain a core or solid projectile produced from one or a combination of the following: tungsten, steel, or beryllium copper alloys;

d6 Hardened cores, regardless of caliber, produced from one or a combination of the following: tungsten, steel, or beryllium copper alloy;

d8 Non-metallic cases, including cases that have only a metallic base, for III.a5;

0A505.x Note 2 0A505.x includes ... metallic cartridge cases, and standard metallic projectiles such as full metal jacket, lead core, and copper projectiles.

18b. Metal or plastic parts US Omissions from Multilateral Controls

36,37 WML 3 Note 1.a omits limits in USML III.a5, d1, d6, d8

18c. Metal or plastic parts Multilateral Omissions from US Controls

43,44 USML III.a5 and d8 non-metallic is broader than WML 3 Note 1a plastic

19. Primer

WML 3 Note 1.a ...WML 3 components include primer anvils

USML III.d10 Primers other than Boxer, Bordan, or shotshell types

Note: III.d10 does not control caps or primers of any type in use prior to 1890.

0A505.x Note 2 0A505.x includes Bordan and boxer primers.

19b. Primer Multilateral Omissions from US Controls

38 US omits primer WML 3 primer anvils

19c. Primer US Omissions from Multilateral Controls

45,46 WML omits USML III.d10 and 0A505.x primers

20. Cartridge links and belts

WML 3 Note 1.a WML 3 includes ...cartridge links for WML 1, 2, or 12

USML III.a2 Ammunition preassembled into links or belts;

USML III.d9 Cartridge links and belts for fully automatic firearms controlled in USML I or II

20b. Cartridge links and belts US Omissions from Multilateral Controls

39,40 US omits cartridge links for non-automatic or semi-automatic firearms...

20c. Cartridge links and belts Multilateral Omissions from US Controls

47 WML omits ammunition preassembled into links or belts

21. Anvils, bullet cups, rotating bands

WML 3 Note 1.a anvils, bullet cups, rotating bands

21b. Anvils, bullet cups, rotating bands US Omissions from Multilateral Controls

41-43 US does not control anvils, bullet cups, or rotating bands

22 Safing

WML 3.a Note 1.b Safing and arming devices, fuzes, sensor and initiation devices

MTCR 2A1f Weapon or warhead safing, arming, fuzing, and firing mechanisms ...

USML III.d11 Safing, arming, and fuzing components (to include target detection and proximity sensing devices) for the ammunitions in this category

USML IV.h9 Missile and rocket safing, arming, fuzing, and firing (SAFF) components (to include target detection and proximity sensing devices)

22a Safing substantially equivalent

12-15 safing, arming, fuzing, firing WML 3a Note 1b, MTCR 2A1f/USML III.d11, IV.h9

22c. Safing Multilateral Omissions from US Controls

48,49 WML and MTCR omit US target detection and proximity sensing devices

23. Power supplies

WML 3 Note 1.c power supplies with high one-time operational output

USML II.j14 Prime power generation, energy storage, thermal management, conditioning, switching, and fuel-handling equipment, and the electrical interfaces between the gun power supply and other turret electric drive components of II.d kinetic weapons

3A226 High-power direct current power supplies producing over 8 hours 100 V or greater with current output of 500 A or greater and current or voltage stability better than 0.1% over 8 hours

3A227 High-voltage direct current power supplies producing over 8 hours 20 kV or greater with current output of 1A or greater and current or voltage stability better than 0.1% over 8 hours.

23b. Power supplies US Omissions from Multilateral Controls

44 WML 3 Note 1.c is broader than USML II.j14 and 3A226 and 3A227 by omitting US limits on one time operational output

23c. Power supplies Multilateral Omissions from US Controls

50 USML II.j14 includes power supply features other than WML 3 Note 1.c output

24. Combustible cases

WML 3 Note 1.d combustible cases for charges

USML III.d7 ... combustible cases for USML II

24b. Combustible cases US Omissions from Multilateral Controls

WML 3 Note 1.d for charges is broader than USML III.d7for USML II

25. Submunitions and terminal guidance

WML 3 Note 1.e Submunitions including bomblets, minelets and terminally guided projectiles for WML 1, 2, or 12

USML III.d4 Projectiles ... guided or unguided for USML II

USML III.d5 ... sub-munitions (e.g., bomblets or minelets) ...for USML II

USML III.j13 Terminal seeker assemblies for category III

7A611 Military fire control, laser, imaging , and guidance equipment, as follows:

- a Guidance or navigation systems, not elsewhere specified on the USML, that are for a defense article on the USML or a 600 series item;
- x Components, including accelerometers, gyros, angular rate sensors, gravity meters (gravimeters), and inertial measurement units (IMUs), that are for USML XII or 7A611, and that are NOT:
 - x1 in the USML or elsewhere within 7A611;
 - x2 Described in 6A007, 6A107, 7A001, 7A002, 7A003, 7A101, 7A102, or 7A103; or
 - x3 Elsewhere specified in 7A611,y or 3A611,y.

25a Submunitions and terminal guidance substantially equivalent

16-18 WML 3 Note 1.e for WML 2 or 12/USML III.d4,5 for II

25b Submunitions and terminal guidance US Omissions from Multilateral Controls

WML 3 Note 1.e terminally guided projectiles for WML 1, 2, or 12 is broader than USML III.d4,5 only for II or 7A611 only for USML or 600 series. .

26. Electromagnetic

USML III.a8 Electromagnetic armament projectiles or billets for weapons with a design muzzle energy exceeding 5 MJ

26.b Electromagnetic US Omissions from Multilateral Controls

50 WML omits USML III.a8

27 Useless cartridge and shell casings

USML III Note 2 decontrol cartridge and shell casings rendered useless

27b Useless cartridge and shell casings US Omissions from Multilateral Controls

51 WML omits USML III Note 2 (WML 1 Note 1.d "Deactivated Firearms" does not apply to ammunition)

28 Shotgun shells

0A505.b Buckshot (No.4 .24" diameter and larger) shotgun shells

0A505.c Shotgun shells (including less than lethal rounds) that do not contain buckshot

1A984 Shotgun shells that contain chemical irritants

28c Shotgun shells Multilateral Omissions from US Controls

51-53 WML omits 0A505.b,c and 1A984 shotgun shells

29 Blank and dummy ammunition

WML 3 Note 2 c decontrol blank and dummy ammunition not incorporating components for live ammunition

0A505.d Blank ammunition for 0A501

29c Blank and dummy ammunitions Multilateral Omissions from US Controls

54 US omits WML 3 Note 2.c decontrol

55 WML omits 0A505.d

30 Fuse setting devices

WML 3b Fuse setting devices for WML 3a ammunition for WML 1, 2, or 12

USML III.b2 Fuze setting devices for USML III ammunition

30a Fuse setting devices substantially equivalent

19 WML 3.b/USML III.b2

31 Other Components

WML 1, 2, 3 headings each control specially designed components for 1, 2, 3 sub-items. These are matched by 0A501.x, 0A505.x, and 0A602.x, except for the following 16 examples of specially designed parts and components in proposed USML I, II, III: I.e, I.h1, I.h3, II.a5, II.j4, II.j5, II.j10 II.j13, II.j14, II.j15, III.a10, III.d4, III.d5, III.d11, III.d12, III.d13.

It is recommended that “and specially designed parts and components therefor” be deleted from I.e, I.h1, I.h3, II.a5, II.j4, II.j5, II.j10 II.j13, II.j14, II.j15, III.a10, III.d4, III.d5, III.d11, III.d12, and III.d13

31a Other components substantially equivalent

20-22 WML 1, 2, 3/0A501.x, 0A505.x, 0A602.x (after 16 deletions from USML recommended above)

31c Other components Multilateral Omissions from US Controls

56-124 The other USML I, II, III and 0A501-0A505 components not examined above are:

- USML I.g Barrels, receivers (frames), bolts, bolt carriers, slides, or sears for USML I....b ...;
- h1 Drum and other magazines for firearms to .50 caliber with a capacity greater than 50 rounds, regardless of jurisdiction of the firearm;
- h2 Parts and components for conversion of a semi-automatic firearm to a fully automatic firearm;
- USML II.j1 Gun barrels, rails, tubes, and receivers ...;
- j3 Breech blocks;
- j4 Firing mechanisms;
- j6 Servo-electronic and hydraulic elevation adjustment;
- j7 Muzzle brakes;
- j8 Bore evacuators;
- j9 Independently powered ammunition handling and platform interface as follows:
- j9i Carriages;
- j9iii Gun pallets;
- j9iv Hydro-pneumatic equilibration cylinders; or
- j9v Hydro-pneumatic systems scavenging recoil energy to power howitzer functions;
- j10 Recoil systems to mitigate the shock associated with the firing process of guns integrated into air platforms;
- j11 Independent ammunition handling;
- j12 Ammunition containers/drums, chutes, conveyor elements, and ammunition container/drum entrance and exit units;
- j13 Aircraft/gun interface units with rate of fire greater than 100 rounds per minute;
- j16 Classified
- USML III.d3 projectiles of any caliber produced from depleted uranium;
- d6 Hardened cores, regardless of caliber, produced from one or a combination of the following: tungsten, steel, or beryllium copper alloy;
- d15 Classified
- 0A501.c Barrels, cylinders, barrel extensions, ... bolts, bolt carriers, operating rods, gas pistons trigger housings, triggers, hammers, sears, disconnectors, pistol grips that contain fire control parts or components (e.g., triggers, hammers, sears, disconnectors) and buttstocks that contain fire control parts or components for 0A501.a or .b or USML I unless listed in I.g or .h
- e Receivers (frames) and complete breech mechanisms, including castings, forgings or stampings thereof for 0A501.a or .b
- 0A502 Shotguns, complete trigger mechanisms, magazines and magazine extension tubes, complete breech mechanisms, except equipment used exclusively to treat or tranquilize animals
- 0A505.x Note 3 The controls on parts and components in 0A505.x include those parts and components that are common to ammunition and ordnance described in 0A505.x and to USML III

32 Production

WML 18.a ... equipment for the production of WML 1, 2, 3

WML 18.b ... environmental test facilities and equipment therefor, for the certification, qualification or testing of WML

Note WML 18.a and .b include:

- a Continuous nitrators
- b Centrifugal testing ...
- c Dehydration presses
- d Screw extruders for military explosive extrusion
- e Cutting machines for sizing of extruded propellants
- f Sweetie barrels (tumblers) 1.85 m or more in diameter and having over 227 kg product capacity
- g Continuous mixers for solid propellants
- h Fluid energy mills for grinding or milling the ingredients of military explosives
- i Equipment to achieve both sphericity and uniform particle size in metal powder listed in WML 8.c.8 (aluminum powder particle size 60 micrometer or less)
- J Convection current converters for the conversion of materials listed in WML 8.c.3 (carboranes, decaborane, pentaboranes and their derivatives)

0B501 Test, inspection, and production commodities for development or production of 0A501 or USML I, as follows:

- a Small arms chambering machines
- b Small arms deep hole drilling machines and drills therefor
- c Small arms rifling machines
- d Small arms spill boring machines
- e Dies, fixtures, and other tooling

0B505 Test, inspection, and production commodities for development or production of 0A505 or USML III, as follows:

- a Tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment, not USML III* for production of 0A505.a or .x or USML III
- * No such items in proposed USML III
- b Equipment for production of 0A505.b
- c Equipment for production of 0A505.c
- d Equipment for production of 0A505.d
- x components for 0B505.a

0B602 Test, inspection, and production commodities for development or production of 0A602 or USML II

- a1 Gun barrel rifling and broaching machines and tools therefor
- a2 Gen barrel rifling machines
- a3 Gun barrel trepanning machines
- a4 Gun boring and turning machines
- a5 Gun honing machines of 6 feet stroke or more
- a6 Gun jump screw lathes
- a7 Gun rifling machines
- a8 Gun straightening presses
- b Jigs and fixtures and other metal-working implements for manufacture of 0A602 or USML II
- c Other tooling and equipment for production of 0A602 or USML II
- d Test and evaluation equipment and test models, including diagnostic instrumentation and physical test models for 0A602 or USML II

1B608,c Environmental test facilities for certification, qualification, or testing of 1C608 or USML V

32a Production substantially equivalent

- 23 WML 18.a for WML 2/0B602.c
- 24 WML 18.b/1B608.c

32b Production US Omissions from Multilateral Controls

- 52, 53 WML 18.a for WML 1 and 3 is broader than 0B501, 0B505, because "include" in WML 18.a Note makes a-j only non-definitive examples, whereas 0B501 controls only a-c and 0B505 controls only a-d and x.
- 54-63 US omits WML 18.a Note a-j
- 64-66 US omits WML 18.b for WML 1, 2, 3

32c Production Multilateral Omissions from US Controls

- 125-164 WML omits:
test and inspection in 0B501, 0B505, 0B602
development in 0B501 and 0B505
0B501.a-e, 0B505.,a-d, x, 0B602.a1-8, b, d

33 Software and Technology

WML 21 Software for:

- a1 development, production, operation, or maintenance of WML equipment
- a2 development or production of WML material
- a3 development, production, operation or maintenance of WML software
- b1 military use and modelling, simulating or evaluating military weapon systems
- b2 military use and modeling or simulating military operational scenarios
- b3 determining the effects of conventional ... weapons
- c enabling equipment not WML-controlled to perform military functions of WML-controlled equipment.

WML 22 Technology for

- a development, production, operation, installation, maintenance (checking), repair, overhaul, or refurbishing of WML-controlled items.
Note 1: development, production, operation, installation, maintenance (checking), repair, overhaul, or refurbishing of WML-controlled items remains under control even when applicable to any item not WML-controlled.
- b1 design, assembly, operation, maintenance, or repair of complete installations for WML-controlled items, even if the components of such production installations are not WML-controlled
- b2 development or production of small arms, even if used to produce reproductions of antique small arms
Note 2 WML 22 does not apply to:
 - a Technology that is the minimum necessary for the installation, operation, maintenance (checking), or repair of items not WML-controlled or whose export has been authorized
 - b Technology that is "in the public domain," "basic scientific research," or the minimum necessary information for patent applications.

USML I.i Technical data and defense services for I.a,b,d,e,g,h or classified 0A501, 0B501, 0D501, 0E501

USML II.k Technical data and defense services for II.a,b,d,e,f or classified 0A602, 0B602, 0D602, 0E602

USML III.e Technical data and defense services for III.a,b,d or classified 0A505, 0B505, 0D505, 0E505.

0D501 Software for development, production, operation, or maintenance of 0A501 or 0B501.

0D505 Software for development, production, operation, or maintenance of 0A505 or 0B505.

0D602 Software for development, production, operation, or maintenance of 0A602 or 0B602.

0E501 Technology for development, production, operation, installation, maintenance, repair, or overhaul of 0A501 or 0B501, as follows:

- a Technology for development or production of 0A501 (other than 0A501.y) or 0B501;
- b Technology for operation, installation, maintenance, repair, or overhaul of 0A501 (other than 0A501.y) or 0B501.

0E502 Technology for development or production of 0A502.

0E504 Technology for development or production of 0A504 that incorporate a focal plane array or image intensifier tube.

0E505 Technology for development, production, operation, installation, maintenance, repair, overhaul, or refurbishing of 0A505.

0E602 Technology for development, production, operation, installation, maintenance, repair, overhaul, or refurbishing of 0A602 or 0B602, or 0D602

0E982 Technology for development or production of ... 0A503

33a Software and technology substantially equivalent

25-27 WML21a1,2, WML 22a/USML II,IIk,IIIe. 0D501,5, 602, 0E501,2,5, 602, 982

33b Software and technology US Omissions from Multilateral Controls

67-74 WML21a3,b1-3,c, WML22aNote 1, b1,2

33c Software and technology Multilateral Omissions from US Controls

165 0E504

PUBLIC SUBMISSION

As of: 6/20/18 4:17 PM
Received: June 04, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93j9-1p70
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0050

Public comment 45. Anonymous. 6-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us.

PUBLIC SUBMISSION

As of: 6/20/18 4:29 PM
Received: June 04, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93ja-p7p6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0051

Public comment 46. Anonymous. 6-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I would like to offer my comment in absolute opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. To me, this rule has profits for gun industry written all over it. Perhaps that's because the U.S. gun manufacturers are not doing well domestically. NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. I'm also disgusted by the rule's attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen the lives of so many of our fellow Americans. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

PUBLIC SUBMISSION

As of: 6/20/18 4:35 PM
Received: June 05, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93jg-m2vy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0053

Public comment 47. Individual. E Cabell. 6-5-18

Submitter Information

Name: Elizabeth Cabell

General Comment

I am writing to submit my comment in opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule appears to have just one purpose: to garner profits for a U.S. gun industry to offset reductions in domestic sales. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change; it has not been supported by any citizen groups. Transferring oversight responsibilities to an agency that prioritizes business over national security would make U.S. exports of small arms, including semi-automatic weapons, would be very dangerous to other countries of the world. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which represents an unfortunate loss of important monitoring. I also find the rules attempts to legitimize semiautomatic assault rifles as civilian products, when these battlefield weapons have stolen so many of our loved ones from us, to be appalling. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally.

PUBLIC SUBMISSION

As of: 6/20/18 4:38 PM
Received: June 05, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93jy-7tsu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0054

Public comment 48. Individual. L McElroy. 6-5-18

Submitter Information

Name: Lisa McElroy

General Comment

I strongly oppose the proposed rule to transfer oversight of "non-military" firearms exports from the State Department to the Commerce Department. This proposal benefits the gun lobby and has come about after years of lobbying by the NRA and the NSSF. By transferring oversight responsibilities to an agency that prioritizes business over national security, this proposal would make U.S. exports of small arms more dangerous. Congress would lose its ability to oversee commercial weapons sales of \$1 million or more, This rule would also legitimize semiautomatic assault rifles, labeling them "civilian" products when these battlefield weapons have taken so many loved ones--innocent people at school, at church, at the movies, in a nightclub. This proposed rule is only in place to garner profits for the U.S. gun industry overseas--a cynical money grab that would be deadly for innocent people. Do the right thing--say no to this proposal and protect lives.

PUBLIC SUBMISSION

As of: 7/17/18 4:33 PM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9438-du4i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1676

Public comment 49. Individual. Individual. 7-4-18

Submitter Information

Name: Elliot Daniels

General Comment

I oppose the proposal to transfer authority for export control regulations for firearms from the Dept of State/ITAR to the Dept of Commerce.

PUBLIC SUBMISSION

As of: 6/20/18 4:44 PM
Received: June 09, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93me-7v1d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0056

Public comment 50. Individual. D Bohn. 6-9-18

Submitter Information

Name: Diana Bohn

Address:

618 San Luis
Berkeley, CA, 94707

Email: nicca@iagc.org

Phone: 510-525-5497

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. Regarding wide retail availability of firearms, about which comment has been requested, many countries, including Mexico, prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that

compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[ii] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 6/20/18 4:46 PM
Received: June 14, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93pn-sqqu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0057

Public comment 51. Individual. P W. 6-14-18

Submitter Information

Name: Paul W

General Comment

I oppose the proposed rule on gun exports because. Proposed rule treats semi-automatic assault rifles as non-military But US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles & handguns, as well as of any larger caliber firearm. Many semi-automatic rifles are also easily converted to fully automatic. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate export of arms & would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons which limits its ability to comment on related human rights concerns, as it recently did on the Philippines & Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. In a September 15, 2017, letter, Senators Ben Cardin, Dianne Feinstein, & Pat Leahy explicitly noted that this move would violate Congressional intent & effectively eliminate Congress proper role.

New rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the taxpayers will absorb the cost of reviewing applications and processing licenses not the gun exporters that benefit from these sales.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

Rule would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. Registration of

exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking. Rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively enabling 3D printing of firearms in US & globally. By eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could he State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

Proposed change will reduce transparency and reporting on gun exports by eliminating Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. Export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 6/20/18 4:49 PM
Received: June 15, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93qd-wcju
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0058

Public comment 52. Individual. M Bazan. 6-15-18

Submitter Information

Name: Maria Carla Condori Bazan

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 6/20/18 4:52 PM
Received: June 16, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93qs-fdv7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0059

Public comment 53. Individual. D Pasta. 6-15-18

Submitter Information

Name: Diane Pasta

Address:

Des Moines, WA, 98198

Email: Dxpasta@Gmail.com

General Comment

I am Diane Pasta, a Quaker (Religious Society of Friends). As a person of faith and a citizen of the US, I am concerned about gun violence and militarization, which makes everyone less safe.

I oppose the proposed rule for the following reasons:

- 1.The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups use semi-automatic rifles in armed conflicts. We should prohibit civilian possession of semi-automatic rifles and handguns, and larger caliber firearm. Semi-automatic rifles are easily converted to fully automatic firearms. These weapons have substantial military utility,so transfer of these firearms to Commerce Dept.control is inconsistent with Congressional attempts to regulate the export of arms.
- 2.The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, limiting its ability to comment on related human rights concerns. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
- 3.The switch from State to Commerce will mean that the brokers and financiers who arrange shipments of semiautomatic firearms will no longer have a statutory requirement to register and obtain a license, increasing risk of trafficking.
- 4.The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny

weapons licenses to international human rights violators.

5. End-use controls are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history. But the transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of weapons. We can't have everyone with access to a 3D printer, anywhere, entitled to produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms. It is effectively eliminating many means to do background checks on domestic sales and end-use controls on international exports.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce. The BIS's enforcement office, with no staff in many parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency - the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control are weapons of choice for criminal organizations in countries that have increased violence. The export of these weapons should be subject to more controls, not less.

Thank you for the opportunity to comment on this important matter.

PUBLIC SUBMISSION

As of: 6/20/18 4:54 PM
Received: June 16, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93re-tfb5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0060

Public comment 54. Individual. C Burns. 6-16-18

Submitter Information

Name: Chris Burns

Address:

12945 Emmer Place
Apple Valley, 55124

Email: sharpdressedman@msn.com

Phone: 9522107604

General Comment

The proposed rule changes must be amended to improve American firearm manufacturers ability to manufacture and export civilian spong use firearms. Firearms other than fully automatic weapons have no military use or provide any advantage as these firearms have been in existence and production around the world for more than 50 years and are common nearly everywhere you go in the world. The use of these firearms for all sporting and lawful purpose is common worldwide wherever the ownership of firearms is not highly restricted. Allowing the export of these firearms will greatly improve the ability of American manufacturers of these products, most of which are small businesses that can't afford the onerous requirements of ITAR export, the ability to sell their products on the open market and increase the footprint of American made products worldwide.

The rules for traveling out of the US with these firearms also needs to be amended to allow a US citizen the ability to travel to a foreign country with their personally owned weapons without onerous and unnecessary export control to allow individuals the ability to travel to said foreign countries for the purposes of competition, hunting or personal protection any place said weapons are legal to possess. These firearms have no military use or pose any military threat to our country as they are already available all over the world.

PUBLIC SUBMISSION

As of: 6/20/18 4:56 PM
Received: June 18, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93se-vw5z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0061

Public comment 55. Individual. A Tomassi. 6-18-18

Submitter Information

Name: Alexa Tomassi

Address:

213 Washington St
Wallingford, CT, 06492

Email: alexa.tomassi@gmail.com

Phone: 2033170393

Fax: 06492

General Comment

To: Secretary of State Mike Pompeo
Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that will make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

Sources:

[1] The Washington Post, "The Trump administration wants to make it easier to sell U.S. guns abroad. Here's what you need to know" June 4, 2018. https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm_term=.cdb39dd2a669

[2] Salon, "U.S. gun industry wants a bigger piece of the world's arms trade," June 1, 2018. <https://www.salon.com/2018/06/01/u-s-gun-industry-wants-a-bigger-piece-of-the-worlds-arms-trade/>

PUBLIC SUBMISSION

As of: 6/20/18 5:00 PM
Received: June 18, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93sg-cmj7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0062

Public comment 56. Individual. A Welsh. 6-18-18

Submitter Information

Name: Amy Welsh

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

As gun violence continues to tear lives apart at an alarming rate, we need tougher gun controls now more than ever. The U.S. needs to be proactive in their approach, especially when global security is such an issue. At this point, we're not even being reactive.

PUBLIC SUBMISSION

As of: 6/20/18 5:01 PM
Received: June 18, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93sg-c5bg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0063

Public comment 57. Individual. L Bopp. 6-18-18

Submitter Information

Name: Lauren Bopp

General Comment

Export license oversight for firearms should remain with the State Department. The proposed rule to move it to Commerce is short-sighted and will only aggravate the crisis we have in this country surrounding firearm deaths. We also must not take away valuable tools that law enforcement have to fight organized crime and terrorism across borders.

I also strongly oppose transferring the cost of processing licenses from gun manufacturers to taxpayers and removing blocks on the 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This rule only makes sense if you put the profits of gun manufacturers ahead of public safety and the safety of our police and border agents--in other words, no sense at all.

PUBLIC SUBMISSION

As of: 7/17/18 4:35 PM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9438-zyp0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1677

Public comment 58. Individual. Alisheba Hurwitz. 7-4-18

Submitter Information

Name: Alisheba Hurwitz

General Comment

I oppose this rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department. This rule will remove safeguards against dangerous arms deals.

PUBLIC SUBMISSION

As of: 6/20/18 5:08 PM
Received: June 18, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93si-bpxs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0065

Public comment 59. Individual. L Chain. 6-18-18

Submitter Information

Name: Leslie Chain

General Comment

"Commerce" is exporting guns for murder? Organized crime "commerce?"

PUBLIC SUBMISSION

As of: 6/20/18 5:13 PM
Received: June 18, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93sk-sjru
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0066

Public comment 60. Individual. M StJohn. 6-18-18

Submitter Information

Name: Margaret StJohn

General Comment

I am deeply opposed to the changes outlined in this proposal. Sales for these weapons should not be controlled by the Commerce Department, but should remain the purview of the State Department. This is central to homeland security, not commerce. Further, Semi automatic assault weapons are NOT civilian weapons and should not be treated or classified as such. And moreover, the whole initiative appears to be a transparent effort by gun lobbyists to increase profits in the industry without regard to public safety. I am strongly opposed to this proposal. BIS-2017-0004-0001.

PUBLIC SUBMISSION

As of: 6/20/18 5:16 PM
Received: June 19, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93t2-47rj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0067

Public comment 61. Individual. M Olsen. 6-19-18

Submitter Information

Name: Marsha Olsen

General Comment

Please reverse the proposed regulations that will make it easier to export semi-automatic weapons and ammunition. We should not eliminate Congressional oversight of these sales. There is a reason that we need Congressional oversight in order for ALL American voices to be heard. We must not weaken end-use controls and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, particularly in our schools. We must not be partly responsible for killings of innocents in other countries. U.S. export controls for weapons used in violence should be made stronger, not weaker.

PUBLIC SUBMISSION

As of: 6/20/18 5:17 PM
Received: June 19, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93tf-7o4j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0068

Public comment 62. Anonymous. 6-19-18

Submitter Information

Name: Anonymous Anonymous

Address:

Benedek
Nyikos
El Cerrito, CA, 94530

General Comment

The United States should be passing stricter gun control laws, not attempting to make it easier to distribute weapons of war abroad. Our nation should not be making the world less safe by putting dangerous weapons in civilian hands.

PUBLIC SUBMISSION

As of: 6/20/18 5:19 PM
Received: June 19, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93t4-lown
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0069

Public comment 63. Individual. W Castner. 6-19-18

Submitter Information

Name: William Castner

General Comment

Kindly accept this comment in strong opposition to this proposed Rule. Among other reasons, liberalizing the export of firearms to foreign countries may allow terrorists to have easier access to firearms without sufficient foreign safeguards in place. If the U.S. government were to allow the gun industry to experience substantial profits due to this rule change at a minimum it should secure assurances & best practices from gun manufactures to keep US citizens safer such as assurances against sale of firearms to retailers with a record or suspicion of gun trafficking.

PUBLIC SUBMISSION

As of: 6/20/18 5:23 PM
Received: June 20, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93to-zzu4
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0070

Public comment 64. Individual. J Zocco Hochhalter. 6-20-18

Submitter Information

Name: Jerrold Zocco-Hochhalter

Address:

30218 Okee Trail

Pine, CO, 80470

Email: zhawke2002@msn.com

Phone: 7202208855

General Comment

This proposed rule goes against all things related to common sense. The government should be making it MORE difficult, not LESS difficult, for international weapons sales.

PUBLIC SUBMISSION

As of: 6/20/18 5:25 PM
Received: June 20, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93tp-4yh2
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0071

Public comment 65. Individual. D Haessig. 6-20-18

Submitter Information

Name: Dana Haessig

Address: United States,

General Comment

Hi --

Reducing regulations on firearms, guns, and ammunition is a dangerous and publicly unsupported plan. With the increase in gun violence in the US, there has been a significant increase in support by the public for INCREASED gun regulations, not decreased gun regulations that are at the whim of the President. The ability to sell more firearms outside the US more freely makes the US an arms dealer to criminals world wide. That is something that the Justice Department has fought for decades. This policy change only makes sense if you stand to gain financially from it, and this administration most certainly does stand to gain financially. The NRA will continue to fund them indefinitely with this type of change.

Please do NOT make this change, it is anti-American and flies in the face of everything American was built to represent.

Sincerely,

Dana Haessig

PUBLIC SUBMISSION

As of: 6/20/18 5:28 PM
Received: June 20, 2018
Status: Posted
Posted: June 20, 2018
Tracking No. 1k2-93tw-6d5p
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0072

Public comment 66. Individual. L Bungert. 6-20-18

Submitter Information

Name: Lee Bungert

Address:

104 3rd Ave NW
Faribault, MN, 55021

Email: mr_lee@hickorytech.net

Phone: 507-333-4663

General Comment

Gun Manufacturers make enough money without changing who oversees them. Making it easier for them to sell guns anywhere, with rules that are pretty much non-existent is ridiculous. Don't do it.

PUBLIC SUBMISSION

As of: 6/21/18 7:49 AM
Received: June 20, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93tw-73jt
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0073

Public comment 67. Individual. C Light. 6-20-18

Submitter Information

Name: Caroline Light

Address:

200 Payson Rd

Belmont, 02478-2834

Email: clighthouse200@gmail.com

General Comment

Please do NOT allow this rule to go into effect! do NOT transfer the oversight of international gun sales to the Commerce Department (from the State Dept). This is a baldly calculated effort to deregulate the overseas sale of firearms, an act that favors manufacturers of weaponry while deregulating the US's distribution of firearms to other nations.

PUBLIC SUBMISSION

As of: 6/21/18 8:14 AM
Received: June 05, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93jy-il su
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0074

Public comment 68. Individual. S Anonymous. 6-21-18

Submitter Information

Name: Sherrie Anonymous

General Comment

I am strongly opposed to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is insane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house. It's time to put commonsense ahead of the almighty dollar.

PUBLIC SUBMISSION

As of: 6/21/18 8:21 AM
Received: June 12, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93op-skgd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0075

Public comment 69. Anonymous. 6-12-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Im 60 years old and semi-retired. I operated a gunsmith shop in my early twenties but gave it up to better support my family. However, I always intended to go back to gunsmithing later in life. Finally that happened, I spent quite a bit of money that would have funded my retirement starting my business. I had a new building built, I bought and learned to use 3 manual lathes and a mill with the intention of getting a manufacturers FFL and making a few custom firearms a year, restoring and selling a few older firearms a year and doing general repairs. I figured I would make \$5000 to \$10,000 a year to supplement my retirement while doing a job my community needed. I probably spent \$85,000 or so on my building, equipment and tools.

However, the Obama administration changed the interpretation of the ITAR rules and started requiring holders of FFL-07 licenses (manufacturing FFL) to send nearly \$3000 per year to the state department in ITAR fees. This could well have been half or more of my yearly profits and meant I had to settle for a type 01 FFL and be a gunsmith only. At that time, as a gunsmith I could do nearly any repair, customization or improvement for a customer on his/her firearm but could not improve, customize or refinish a firearm and then sell it as that would make me a manufacturer. Although this wasnt the future Id worked towards for nearly 40 years, it was better than nothing.

Then, in July of 2016 the Obama administration again reinterpreted the existing rules and decided to bring virtually all the jobs gunsmiths do under the ITAR umbrella. This was obviously intended to bankrupt the nations gunsmiths, and, I suspect to chill the pre-election free speech of Gunsmith/2nd Amendment activists such as myself. It did not suppress my free speech but it did cause me to start turning away 90% of my potential customers. Under these rules refinishing firearms and replacing parts is about the only thing a gunsmith is now allowed to do. According to the 2nd Obama reinterpretation of the ITAR rules even making a screw or stock for a 150 year-old firearm could be interpreted as a violation.

Since these rules took effect in July of 2016 I dont believe I have made a monthly profit, even once. Threading barrels, customizing, , making stocks, dovetailing sight groves, re-chambering, making obsolete parts and the like are all still banned to my knowledge. And, with the exception of the occasional machine shop work, my three lathes and my mill are still idle.

I am again considering closing my shop because of this. My insurance alone is nearly a grand a year and Im not sure how long I can survive while waiting on this to be fixed. Please, lets get the State Department out of the gunsmith business and again allow a gunsmith to make and sell a few custom firearms a year without being bankrupted by ITAR.

PUBLIC SUBMISSION

As of: 6/21/18 8:28 AM
Received: June 18, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93sp-5x2c
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0076

Public comment 70. Individual. A Gelman. 6-18-18

Submitter Information

Name: Alice Gelman

General Comment

Hello,

My name is Alice and I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Thank you,
Alice

PUBLIC SUBMISSION

As of: 6/21/18 1:20 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93uf-i2p3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0078

Public comment 71. Individual. C Tischio. 6-18-18

Submitter Information

Name: Carla Tischio

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks." These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar "conversion devices" that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

I also am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military." This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons

is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 6/21/18 1:27 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93uf-rd44
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0079

Public comment 72. Individual. P Kocoras. 6-21-18

Submitter Information

Name: Peggy Kocoras

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military" -- even though US troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals, transfers the cost of processing licenses from gun manufacturers to taxpayers, and enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and lacks the resources to adequately enforce export controls.

Although the current administration views everything on earth as a commodity, some things should not be for sale. Those include semiautomatic weapons. Congress giving up oversight of weapon exports is an abrogation of their responsibilities.

PUBLIC SUBMISSION

As of: 6/21/18 1:30 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93uf-r53j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0080

Public comment 73. Individual. L Bronstein. 6-21-18

Submitter Information

Name: Linda Bronstein

General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess. In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

PUBLIC SUBMISSION

As of: 6/21/18 1:35 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93ug-uvjk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0081

Public comment 74. Individual. A Ioffreda. 6-21-18

Submitter Information

Name: Angelo Ioffreda

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as "non-military" and just another export product, which they most definitely are not. U.S. troops routinely use their weapons in semiautomatic mode. Semiautomatic weapons are used by state and non-state groups in armed conflicts, by drug traffickers and criminal organizations, and the civilian possession of such weapons is prohibited in many countries. The sale of semiautomatic weapons is not a simple commercial transaction.

This misguided proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 6/21/18 1:40 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93ug-ifrg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0082

Public comment 75. Individual. G Collins. 6-21-18

Submitter Information

Name: Gary Collins

General Comment

The national interest of the U.S. is not well served by moving export license oversight for firearms from the Department of State to the Department of Commerce because the wider and less restricted distribution of essentially military weaponry is inimical to the promulgation of international peace and civilian safety, or suppression of misuse of firearms by state and individual actors. The proposed rule change treats semiautomatic assault rifles as "non-military" despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, such weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 6/21/18 1:45 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93ug-d3qr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0083

Public comment 76. Individual. L Amsden. 6-21-18

Submitter Information

Name: Liz Amsden

Address:

Los Angeles, CA, 90042

Email: LizAmsden@hotmail.com

Phone: 2139259254

General Comment

I am writing to STRONGLY oppose moving export license oversight for firearms from the Department of State to the Department of Commerce.

Guns sold for profit contribute to violence around the world as well as in our own country. The US government should be making it MORE difficult to manufacture and export weapons. EVEN if sold to so-called 'friends' of the administration, many end up in the hands of those who use them against American citizens and other innocent people.

Under the proposed rule change semiautomatic assault rifles are treated as "non-military." This, despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, despite the fact these weapons are used by state and non-state groups in armed conflicts, and despite the fact the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political

violence, terrorism, and human rights violations. This is not and WILL NEVER BE acceptable as the end result of a business model.

Firearms, guns ammunition and related article MUST be subject to more controls, NOT fewer.

PUBLIC SUBMISSION

As of: 6/21/18 1:48 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93ug-qylk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0084

Public comment 77. Individual. J Riggs. 6-21-18

Submitter Information

Name: Jenna Riggs

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

This move is only for the profit of the firearm industry. They value profit over human life, and I implore the Commerce Department to view this move as what it is: a gift to big donors, including the NRA, of the current administration. It's function is to create easier purchases of firearms and weapons to the very people that should not have them in the first place. Please have a conscience - we need someone to be the adults in the room.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 6/21/18 1:52 PM
Received: June 21, 2018
Status: Posted
Posted: June 21, 2018
Tracking No. 1k2-93ug-f0c3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0085

Public comment 78. Individual. J Talbot. 6-21-18

Submitter Information

Name: James Talbot

Address:

Austin, TX, 78704-3017

Email: talbot@talbotworld.com

Phone: 5121111111

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce and any move that reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Please don't.

PUBLIC SUBMISSION

As of: 6/28/18 9:46 AM
Received: June 21, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93uh-v95n
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0087

Public comment 79. Individual. N Traum. 6-21-18

Submitter Information

Name: Norman Traum

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 6/28/18 9:49 AM
Received: June 21, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93uk-1wrđ
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0088

Public comment 80. Individual. M Shea. 6-21-18

Submitter Information

Name: Maureen Shea

General Comment

I respectfully ask that changes not be made in the present regulations regarding exporting of semi-automatic weapons and ammunition abroad. With all the illegal arms now circulating in the world, the U.S. should be trying to reduce not add new firearms.

PUBLIC SUBMISSION

As of: 6/28/18 10:08 AM
Received: June 21, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93un-pkwv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0089

Public comment 81. Individual. J Cunningham. 6-21-18

Submitter Information

Name: James Cunningham

Address:

Powell, OH, 43065

Email: james.cunningham@earthlink.net

Phone: 6143260730

Organization: Guitar Instruction

General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This change defies sound reasoning, Aristotelian logic, and common sense to place the baseness of greed above global public safety.

Firearms are used to kill thousands of people every day around the world in acts of organized crime, street crime, political violence, terrorism, and myriad human rights violations. They should be subject to more controls, not fewer. Humanity deserves to be free from the threats posed by deranged, greedy, corrupt individuals like those responsible for proposing this absurd change.

Thank you for considering my comments.

PUBLIC SUBMISSION

As of: 6/28/18 10:11 AM
Received: June 21, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93uo-oow0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0090

Public comment 82. Individual. D Henderson. 6-21-18

Submitter Information

Name: Deirdre Henderson

General Comment

THIS IS A REALLY BAD! IDEA! MOVING EXPORT LICENSE OVERSIGHT FOR FIREARMS TO THE STATE DEPARTMENT IS A VERY BAD IDEA! ARE YOU ALL CRAZY??? ARE YOU SO AFRAID OF THE NRA THAT YOU DO THEIR BIDDING? DO THEY REALLY OWN YOU? HAVE YOU NO MORAL COURAGE? YOUR MOTHERS WOULD NOT BE PROUD OF YOU!!!

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

PUBLIC SUBMISSION

As of: 6/28/18 10:14 AM
Received: June 21, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93uo-2uy3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0091

Public comment 83. Individual. B Olson. 6-21-18

Submitter Information

Name: Barbara Olson

Address:

2253 Everest SE

Grand Rapids, MI, 49507

Email: barbaraannolson@yahoo.com

General Comment

I am wondering how the NRA was able to write legislation supporting the transfer of licensing oversight of weapons of war from the Department of State to the Department of Commerce? At least that is what is occurring to me with this request. I am solidly against moving the oversight of weaponry to the Department of Commerce.

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

PUBLIC SUBMISSION

As of: 6/28/18 10:17 AM
Received: June 21, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93ur-v2lb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0092

Public comment 84. Individual. J Haynes. 6-21-18

Submitter Information

Name: JeVerna Haynes

General Comment

No, no, no! I'm sick of every thing in this country being about making money, instead of about the safety of our people.

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This should not be a matter for Commerce, and must require Congressional oversight.

PUBLIC SUBMISSION

As of: 6/28/18 10:21 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93v2-5rfl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0093

Public comment 85. Individual. E Jaramillo. 6-22-18

Submitter Information

Name: Ellen Jaramillo

Address:

344 Winchester

New Haven, CT, 06511

Email: ellen.jaramillo@yale.edu

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Semiautomatic assault rifles are not sporting or hunting rifles, and not meant for commercial hunting, so they should

not be governed by the Department of Commerce.

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state

groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

Semiautomatic

assault rifles are used in military settings and therefore these types of firearms export license oversight should remain

with the Department of State.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting

on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction,

and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately

enforce

export controls. Semiautomatic assault rifles usage by private citizens results in increased crime, violence, family accidents, and mass murder, and should be subject to more federal government controls, not fewer.

Please do not move export license oversight for firearms from the Department of State to the Department of Commerce.

PUBLIC SUBMISSION

As of: 6/28/18 10:26 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93v5-sj25
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0094

Public comment 86. Individual. E Williams. 6-22-18

Submitter Information

Name: Erick Williams

Address:

1209 Old Hickory

East Lansing, MI, 48823

Email: willnielsen@sysmatrix.net

General Comment

See attached file(s)

Attachments

Commerce rule comment, June 22, 2018

Erick Williams, JD
1209 Old Hickory
East Lansing, MI 48823

June 22, 2018

Regulatory Policy Division
Bureau of Industry and Security
US Department of Commerce
14th St and Pennsylvania Ave, NW, Room 2099B
Washington, DC 20230
<http://www.regulations.gov>

Re: Docket No. BIS-2017-0004; RIN 0694-AF47

Greetings:

These are comments on the Commerce Department proposed rule, “Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List.” 83 Federal Register 24166, May 24, 2018, <https://www.federalregister.gov/documents/2018/05/24/2018-10367/control-of-firearms-guns-ammunition-and-related-articles-the-president-determines-no-longer-warrant>

Background

The rules governing firearm exports should give the police profession a greater, better-defined role in the evaluation of firearm export license applications.

15 CFR 738.2 (d) (2) (ii) (A) (CC) provides that items proposed for export are controlled for “crime control” reasons. The practice of controlling exports for crime control reasons reflects a basic principle

underlying arms control treaties and statutes. The proliferation of weapons should be controlled because it tends to impair the rule of law.

To assure that the rule of law is not impaired by firearm exports, licensing officials should consider the effect of proposed exports on local communities, public safety, peace officer safety, crime control, and control of civil disturbances.

In several parts of the world, armed gangs are impairing the rule of law, and their activities cross borders. As a major producer of firearms, the USA, through export law enforcement, can help limit the flows of weapons to armed gangs. The police profession, closely associated with the rule of law, is a critical stakeholder in the arms export licensing process.

Unfortunately, neither the current nor the proposed rules governing firearm exports provide for export license applications to be vetted by people with police backgrounds.

Historically, the weapons analysts who vet arms export licenses have been with the Defense Department. Military analysts worry (as they should) about the impact of weapons on the battlefield. But defense analysis does not necessarily evaluate transactions with an eye to the security needs of civilian communities -- public safety, peace officer safety, crime control, and the prevention and management of civil disturbances.

Firearms that “no longer warrant control” by the military can nonetheless destabilize communities, overwhelm peace officers and contribute to civil disorder.

Notorious examples of the adverse effects of firearm proliferation have come from Africa and the Middle East as well as closer to home -- Mexico and Central America.

See: Alec MacGillis, *“America's Wild-West Gun Laws Are Helping Fuel The Border Crisis: The Unwanted Traffic Between The Us And Central America Goes Both Ways”* (New Republic, July 21, 2014), <https://newrepublic.com/article/118759/nra-and-gun-trafficking-are-adding-fuel-border-migrant-crisis>

Robert Muggah and Steven Dudley, Op-Ed: *“The Latin American Gun Leak”*, (Los Angeles Times, January 16, 2015), <http://www.latimes.com/opinion/op-ed/la-oe-muggah-arming-latin-america-20150118-story.html>

“Attacks Against Peacekeepers” (United Nations OHCHR, May 2017), <https://www.ohchr.org/Documents/Countries/CF/Mapping2003-2015/Factsheet7-EN.pdf>

“Attacks against civilians and MINUSCA peacekeepers in the town of Bangassou in the Central African Republic” (Office of the Spokesperson for the UN Secretary-General, May 14, 2017) <https://www.un.org/sg/en/content/statement/2017-05-14/statement-attributable-spokesman-secretary-general-attacks-against>

Alex Yablon, *“American Guns Drive the Migrant Crisis that Trump Wants to Fix with a Wall”* (Trace, May 25, 2017) <https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/>

Jonathan Blitzer, *“The Link Between America’s Lax Gun Laws and the Violence That Fuels Immigration”* (New Yorker, March 22, 2018), <https://www.newyorker.com/news/news-desk/the-link-between-americas-lax-gun-laws-and-the-violence-that-fuels-immigration>

Highly destructive weapons should not be exported to civilians.

Whatever short term economic benefit those exports may generate is outweighed by the risk those weapons pose to the safety of peace officers and the rule of law.

We suggest a maximum limit on firepower exported to civilians. Firearms with a muzzle energy higher than 5,000 Joules should be barred from export to non-government end-users. (In ballistics, muzzle energy, commonly expressed in Joules or foot-pounds, is a measure of the destructive potential of a firearm or cartridge. Tables comparing the muzzle energies of various firearms are available on the Internet.)

See: *“Clear and Present Danger: National Security Experts Warn About the Danger of Unrestricted Sales of 50 Caliber Anti-Armor Sniper Rifles to Civilians”* (Violence Policy Center, July 2005), <http://www.vpc.org/studies/50danger.pdf>

Weapons of high destructive potential have no place on any street in the world, and they should be off-limits for export to civilians.

Policy Recommendations

The following changes should be incorporated in the new rules:

1. Prohibit export of firearms, above a maximum limit of destructiveness, to civilian end-users, world-wide. A muzzle energy of 5,000 Joules (3,688 foot-pounds) is here proposed as the maximum limit.
2. Prohibit exports of firearms with muzzle energies less than 5,000 Joules, to civilian end-users, world-wide, if the firearm is likely to outmatch weapons carried by local peace officers or otherwise impair the efforts of peace officers to control crime and civil disturbance.

3. Recognize the police profession as a stakeholder in firearm exports. Give the profession a role in vetting license applications.

Technical Language

The recommendations above may be translated into the EAR framework using the technical language below.

4. In 15 CFR Appendix Supplement No 1 to Part 738, the Commerce Country Chart, add a column 4 under crime control. Mark each country box to indicate that the crime control reason for control applies to all countries.

5. In 15 CFR 738.2 (d) (1), reason for control item 5. Amend item 5 to read (changes in CAPS):

5: Items warranting national security, CRIME CONTROL, or foreign policy controls at the determination of the Department of Commerce.

6. In 15 CFR 738.3 (a) (1) add a sentence that reads: A LICENSE IS REQUIRED FOR ALL DESTINATIONS FOR FIREARMS AND ASSOCIATED EQUIPMENT CONTROLLED UNDER ECCN 0A501, 0A502, 0A504, AND 0A505, WHICH ARE SUBJECT TO 15 CFR 742.7 (b) (2) or (b) (3).

7. In 15 CFR Appendix Supplement No 1 to Part 774, the Commerce Control List, add crime control as a reason for control under 0A501, 0A502, 0A504, and 0A505. CC column 4 (referred to above) should apply to each, entire entry. In each entry, insert: ALL ITEMS ARE SUBJECT TO THE CRIME CONTROL LICENSING POLICY IN 15 CFR 742.7 (b) (2) or (b) (3).

8. Amend 15 CFR 742.7 (b) to read as follows (changes in CAPS):

(b) Licensing policy.

(1) EXCEPT AS DESCRIBED IN (b) (2) and (b) (3) BELOW, applications for items controlled under this section will generally be considered favorably on a case-by-case basis unless there is civil disorder in the country or region or unless there is evidence that the government of the importing country may have violated internationally recognized human rights. The judicious use of export controls is intended to deter the development of a consistent pattern of human rights abuses, distance the United States from such abuses and avoid contributing to civil disorder in a country or region.

(2) A LICENSE APPLICATION FOR A FIREARM WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE (AND EQUIPMENT ASSOCIATED WITH THE FIREARM) SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(3) A FIREARM WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND EQUIPMENT ASSOCIATED WITH THE FIREARM, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY PEACE OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE USED OR OTHERWISE IMPAIR THE EFFORTS OF PEACE OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

9. In 15 CFR Appendix Supplement No 2 to Part 730, Technical Advisory Committees, allow creation of a technical advisory committee with representation from the police profession to provide technical

advice on matters such as police procedure, public safety, peace officer safety, crime control, and control of civil disorder. At least two organizations in the United States -- one federal and the other state-based -- may be competent to give the Commerce Department technical advice on police standards outside the USA. They are the International Criminal Investigative Training Assistance Program, <https://www.justice.gov/criminal-icitap>, and the International Association of Directors of Law Enforcement Standards and Training, <https://www.iadlest.org>.

Thank you for the opportunity to submit comments on the proposed rules.

Sincerely,

Erick Williams, JD

PUBLIC SUBMISSION

As of: 6/28/18 10:36 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93v8-go4h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0095

Public comment 87. Individual. S Crane. 6-22-18

Submitter Information

Name: Sheila Crane

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Such a categorization does not reflect reality. U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Semi-automatic rifles are not appropriate for civilian populations. The Constitution does not guarantee the right to own weapons of mass destruction. The role of government is to protect its citizens and to combat the rise in mass killings of civilians that is directly tied to easy access to semi-automatic weapons.

PUBLIC SUBMISSION

As of: 6/28/18 10:39 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93v9-w2sl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0096

Public comment 88. Individual. J Parker. 6-22-18

Submitter Information

Name: John Parker

General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

PUBLIC SUBMISSION

As of: 6/28/18 10:41 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93v9-78z9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0097

Public comment 89. Anonymous. 6-22-18

Submitter Information

Name: anonymous Anonymous

General Comment

I strongly support this proposed rule change. As it stands today, the regulations imposed upon small to medium sized businesses under ITAR are stifling to business. Most gunsmiths struggle to make a living without the added burden of unnecessary regulatory fees. The modern gunsmith will make his living performing functions like threading muzzles on hunting rifles, installing a new barrel, and minor repair work, none of which constitute manufacturing according to ATF, but which subject him to ITAR regulations and fees. This is a good change, to move the conventional local gunsmith away from these ridiculous burdens.

PUBLIC SUBMISSION

As of: 6/28/18 11:38 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93v9-gyhi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0098

Public comment 90. Anonymous. 6-22-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Today's action will take about 30 seconds.

WHAT'S HAPPENING: The Trump administration wants to transfer licensing and oversight of firearms exports from the State Department to the Commerce Department.

WHAT IT MEANS: The proposal weakens controls over semiautomatic assault weapons and may deregulate 3D printing of guns. It could also weaken controls on gun imports, which means more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups around the globe.

WHO'S BEHIND THIS: The NRA and the Newtown-based National Shooting Sports Foundation. Gun sales have fallen in the US, so they want to open up international markets. They are willing to spread our gun violence all over the world to boost gun industry profits.

WHAT YOU CAN DO: Copy this script and click on the links below to paste your comment.

Please submit your comments to both the Department of State and the Department of Commerce Bureau of Industry and Security (you can submit the same comment to each):

State: <https://www.regulations.gov/comment?D=DOS-2017-0046-0001>

Commerce: <https://www.regulations.gov/comment?D=BIS-2017-0004-0001>

COPY SCRIPT: "I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders.

Arms exports must be subject to more controls, not fewer.

Let me know in the comments if you did it, and if it took you more than 30 seconds. Tell your friends. Thank you for your help to make America and our world less violent.

PUBLIC SUBMISSION

As of: 6/28/18 11:42 AM
Received: June 22, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93vd-70tu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0099

Public comment 91. E Wight. 6-22-18

Submitter Information

Name: Edward Wight

Address:

225 Bryant Ave.

Roslyn, 11576-1153

Email: nwight@uucsr.org

Phone: 5167179581

Fax: 11576-1153

General Comment

As a pastor concerned about reducing violence in the world, I am writing to oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military, yet such firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to rigorous controls.

PUBLIC SUBMISSION

As of: 6/28/18 11:53 AM
Received: June 23, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93vw-25kq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0100

Public comment 92. S Stewart. 6-23-18

Submitter Information

Name: Sarah Stewart

Address:

1045 U.S. Highway 89
Gardiner, 59030

Email: sarahbstewart@yahoo.com

Phone: 4068489900

Fax: 59030

General Comment

Please do not move export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

We are writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Please do not move export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

PUBLIC SUBMISSION

As of: 6/28/18 11:56 AM
Received: June 24, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93w5-usow
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0101

Public comment 93. C Kamerman. 6-24-18

Submitter Information

Name: Cora Kamerman

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: 6/28/18 12:00 PM
Received: June 24, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93wd-7162
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0102

Public comment 94. Individual. K MacLaurin. 6-24-18

Submitter Information

Name: Kirby MacLaurin

General Comment

To: Secretary of Commerce Wilbur Ross

Please reverse the proposed regulations that would weaken end-use controls, enable production of 3D weapons anywhere, make it easier to export semi-automatic weapons and ammunition, and eliminate Congressional oversight of these sales. America is not safer with a heavily armed third world - violence increases in these places, and our borders are flooded with refugees trying to escape the violence. We have also seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

PUBLIC SUBMISSION

As of: 6/28/18 12:05 PM
Received: June 24, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93wk-i5on
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0103

Public comment 95. Individual. G Patton. 6-25-18

Submitter Information

Name: Gary Patton

General Comment

The change in regulations controlling the distribution of firearms overseas is a transparent and cynical effort to boost gun sales during a down market. Making a profit based on the spilling of blood of others is truly immoral and despicable.

PUBLIC SUBMISSION

As of: 6/28/18 12:08 PM
Received: June 24, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93wl-shls
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0104

Public comment 96. Individual. J Godwin. 6-24-18

Submitter Information

Name: Jason Godwin

General Comment

I strongly support the oversight of commonly used hunting and sporting firearms being moved to the department of commerce. The regulations associated with the usml place an unreasonable burden on gunsmiths and federally licensed gun dealers trying to earn a living and support lawful gun ownership.

PUBLIC SUBMISSION

As of: 7/17/18 4:15 PM
Received: June 24, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93wm-wwbi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0105

Public comment 97. Individual. B Watts. 6-24-18

Submitter Information

Name: Bryan Watts

General Comment

I think this rule should change. To free up the burden of ITAR fees on small gun manufacturers. Building a few rifles a year for law abiding citizens should not be something to be punished for.

PUBLIC SUBMISSION

As of: 7/17/18 4:37 PM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9438-7hah
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1678

Public comment 98. Individual. Seren Bradshaw. 7-4-18

Submitter Information

Name: Seren Bradshaw

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Military-style weapons should NOT be available for sale to the general public, of this country or any other country. They most definitely should remain under the control of the US Munitions List.

PUBLIC SUBMISSION

As of: 7/17/18 4:16 PM
Received: June 24, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93wr-j4ad
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0107

Public comment 99. Individual. J Masterson.6-24-18

Submitter Information

Name: Jade Masterson

General Comment

To: Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

Information Sources:

[1] The Washington Post, The Trump administration wants to make it easier to sell U.S. guns abroad. Heres what you need to know June 4, 2018. https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm_term=.cdb39dd2a669

[2] Salon, U.S. gun industry wants a bigger piece of the worlds arms trade, June 1, 2018.

<https://www.salon.com/2018/06/01/u-s-gun-industry-wants-a-bigger-piece-of-the-worlds-arms-trade/>

[3] State Department public comment site: https://www.regulations.gov/document?D=DOS_FRDOC_0001-4527

Commerce Department public comment site: <https://www.regulations.gov/document?D=BIS-2017-0004-0001>

PUBLIC SUBMISSION

As of: 6/28/18 12:19 PM
Received: June 25, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93x2-nvp8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0108

Public comment 100. Individual. L Sokoloski.6-25-18

Submitter Information

Name: Laura Sokoloski

General Comment

I oppose the relaxing of rules regarding the export of assault rifles and other arms by U.S. firearm manufacturers, and urge the Commerce and State Departments to oppose these as well. Exporting more arms is not going to help make the world a more peaceful place, especially assault rifles, instead an increased prevalence of firearms simply increases hostilities and leads to more gun related violence and deaths. Exporting an additional 70,000 arms annually will only increase the death toll from 1,000 gun related deaths worldwide every year. This is not something I can support in good conscience.

PUBLIC SUBMISSION

As of: 6/28/18 12:22 PM
Received: June 25, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93x7-sta5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0109

Public comment 101. Anonymous. 6-25-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I see moving this from the Dept of State to the Dept of Commerce as a smart move. As someone who is about to become an FFL/SOT I see no reason to to pay the high registration fee's as i will not be exporting anything and assembling AR15 kits is considered manufacturing. Both activities dont justify itar fees or the complicated compliance. Lets help out small businesses by making this happen.

PUBLIC SUBMISSION

As of: 6/28/18 12:25 PM
Received: June 25, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93x8-4q3f
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0110

Public comment 102. Individual. R Walker. 6-25-18

Submitter Information

Name: ROB WALKER

Address:

PA,

General Comment

i STRONGLY ENCOURAGE THE ADOPTION OF THE NEW RULE CHANGES TO THE INDUSTRY AND
SECURITY BUREAU. THIS NEEDED TO HAPPEN A LONG TIME AGO. U.S. BUSINESSES CAN NOW
COMPETE GLOBALLY.

PUBLIC SUBMISSION

As of: 6/28/18 12:29 PM
Received: June 25, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93x9-woec
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0111

Public comment 103. Individual. P Kober. 6-25-18

Submitter Information

Name: Philip Kober, JD, MD, PhD

Address:

4526 Thurston Ln.

apt. #2

Fitchburg, WI, 53711

Email: doclawpmk@live.com

Phone: 6088196862

Fax: 53711

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. As a physician, I categorically can state that the harm to human beings is no different between semiautomatic and fully automatic weapons. The energy transferred to the bullet is what is important, along with other characteristics such as yawing of the bullet on impact (tumbling), explosive ammunition, and other such characteristics. The only difference between and automatic weapon and a semiautomatic weapon is that the automatic continues to fire simply by holding the trigger down, whereas the trigger must be pulled for each shot for the semiautomatic. The rest of the mechanical actions involved are the same. They both have high velocity, and characteristics of the ammunition that make them deadly to many, many people over a short period of time. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. All of these provisions are DEADLY, and should not be adopted.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 6/28/18 12:32 PM
Received: June 25, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93xa-th6n
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0112

Public comment 104. Individual. C Landale. 6-25-18

Submitter Information

Name: Carol Landale

General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because, amongst other things, the proposed rule change treats semiautomatic assault rifles as non-military." Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

The US has already alienated many of our allies. This rule change adds to the insults already made. Why are there so many immigrants trying to escape gun violence in Central America? More arms to countries like Nicaragua and Honduras will only exacerbate the problem.

PUBLIC SUBMISSION

As of: 6/28/18 12:35 PM
Received: June 26, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93xx-mlh5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0113

Public comment 105. Individual. H Garlington. 6-26-18

Submitter Information

Name: Hensley Garlington

Address:

101 Lake Rd

Jena, LA, 71342

Email: hbgarlington@live.com

Phone: 3183314978

General Comment

I support this change to ease restrictions on exports.

PUBLIC SUBMISSION

As of: 6/28/18 12:38 PM
Received: June 27, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93ye-qipv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0114

Public comment 106, Individual, P Carr, 6-27-18

Submitter Information

Name: Phil Carr

General Comment

I am in agreement with the proposed changes, but would like to ask that the subject of temporary export of firearms, specifically vintage shotguns with barrel lengths over 18 to Canada be clearly addressed.

Although there is information addressing the temporary import of firearms, parts, and accessories in to the US it is less clear on temporary exports out of he US.

There is direction provided for a person traveling out of he country to Canada or other countrys that are transporting their firearms with them but, It is next to impossible to navigate through regulations to try and legally (export) ship a vintage sporting shotgun to Canada to have work performed.

There are thousands of collectors such as myself which need a straight forward, easy to understand process that assures us a way to send a vintage post 1890 shotgun temporarily out of the country, have work performed and returned to us. There are companys that you can hire to perform such temporary export/import but it is very expensive and run into thousands of dollars. Further even amongst these companys there are differences in the understanding of the regulations.

I have called and written to ATF concerning the export/import requirements and the short one line response was You should contact the state department about exportation at 202-663-1282.

I have spoken with representatives from the DOC and they have been freindly and helpful. That said I dont feel most individuals such as myself can feel comfortable shipping a firearm and be assured they are following the legal process.

An example of confusion is that the ATF 27 CFR 478.92 calls out a requirement to mark firearms being imported.

Some of the firearms Import companys but not all have interpreted this to mean that even valuable rare vintage firearms must have the importers name and address clearly marked on the shotgun.

This destroys the originality and effects the value of the firearm that was temporarily exported.

There seems to be of no valued reason to mark these firearms.

After all if I was to fly to Canada and take the firearm with me to have the work performed there is no requirement to perform such intrusive markings.

I have attached a picture of a firearm to show the markings I am referring to, clearly a permanent engraving that permanently damaged a historic shotgun of which there was less than 40 made.

I fail to understand the value of marking pre-owned firearms whether temporarily exported/imported or even firearms purchased and exported to the United States which were originally manufactured in the US.

Because shotguns fall under the DOC, the ATF will not clarify the requirement on shotguns it creates confusion. The ATF refers me back to the State Department, and the DOC does not list any requirements. It is important that any markings be clarified by the DOC, if there is no such requirement.

I respectfully request that the temporary export and then reimport of vintage firearms be reviewed specifically as it applies to shotguns.

This would allow many of our collectors and associations of these vintage shotguns a clear procedure in which to utilize the fine craftsman and gunsmiths in Canada for repair, wood and metal work.much of this work a dying art.

Sincerely,
Phil Carr

Attachments

EA01C2BB-14A8-4476-8801-AE0391C57FDA

83889850-A1AF-43DE-9DCC-BAB1D034E878



WASHSTATEB005217

PUBLIC SUBMISSION

As of: 6/28/18 12:41 PM
Received: June 27, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93yh-fv3h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0115

Public comment 107. Anonymous. 6-27-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I believe the USML causes undue financial harm to any small business that wants to perform many of the duties listed. The cost is prohibitive to most people. The ITAR fee is a way of control by finance rather than laws. 99.9% of people will never come close to being an exporter.

PUBLIC SUBMISSION

As of: 6/28/18 12:48 PM
Received: June 27, 2018
Status: Posted
Posted: June 28, 2018
Tracking No. 1k2-93yq-r37l
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0116

Public comment 108. Individuals. W Root and E Williams. 6-27-18 Note: This is a copy of the comments submitted to the Department of State on the ITAR amendments

Submitter Information

Name: Erick Williams

Address:

1209 Old Hickory
East Lansing, MI, 48823

Email: willnielsen@sysmatrix.net

General Comment

This is a copy of the comments submitted to the Department of State on the ITAR amendments

Attachments

ITAR amendment comments June 27, 2018

William A. Root
2700 Burcham Drive, Apt 234
East Lansing, MI 48823
billroot23@gmail.com

Erick Williams, JD
1209 Old Hickory
East Lansing, MI 48823
willnielsen@sysmatrix.net

June 27, 2018

US Department of State
Bureau of Political Military Affairs
Directorate of Defense Trade Control
DDTCPublicComments@state.gov
<http://www.regulations.gov>

Re: ITAR Amendment—Categories I, II, and III DDTC

Greetings:

These are comments on the Department of State's proposed rule to amend the International Traffic in Arms Regulations (ITAR) and categories I, II and III of the US Munitions List (USML). 83 Federal Register 24166, May 24, 2018.

Background

The ITAR amendment should be revised to better support the rule of law.

The Arms Control and Disarmament Act, at 22 USC 2551, declares:

An ultimate goal of the United States is a world ... in which the use of force has been subordinated to the rule of law ...

No profession is more closely identified with the rule of law than the police profession. Peace officers are the street-level keepers of the law, all over the world. If the United States is committed to "subordinating the use of force to the

rule of law”, it must protect the environment in which peace officers do their work. When armed gangs can overpower local peace officers, local communities become war zones where the rule of law is subordinated to the use of force.

We fail to protect peace officers when we put highly destructive weapons in the hands of civilians who target the police.

The ITAR amendment, as proposed, will make it easier to put firearms in the hands of civilians and armed gangs that are superior to those carried by local peace officers, thus threatening the rule of law in local communities. In several parts of the world, armed gangs are impairing the rule of law, and their activities cross borders. Notorious examples of the adverse effects of firearm proliferation can be seen in Africa and the Middle East, as well as closer to home – in Central America and Mexico, with adverse effects along the southern border of the United States.

See: Alec MacGillis, *“America's Wild-West Gun Laws Are Helping Fuel The Border Crisis: The Unwanted Traffic Between The US And Central America Goes Both Ways”* (New Republic, July 21, 2014), <https://newrepublic.com/article/118759/nra-and-gun-trafficking-are-adding-fuel-border-migrant-crisis>

Robert Muggah and Steven Dudley, Op-Ed: *“The Latin American Gun Leak”*, (Los Angeles Times, January 16, 2015), <http://www.latimes.com/opinion/op-ed/la-oe-muggah-arming-latin-america-20150118-story.html>

“Attacks against Peacekeepers” (United Nations OHCHR, May 2017), <https://www.ohchr.org/Documents/Countries/CF/Mapping2003-2015/Factsheet7-EN.pdf>

“Attacks against civilians and MINUSCA peacekeepers in the town of Bangassou in the Central African Republic” (Office of the Spokesperson for the UN Secretary-General, May 14, 2017) <https://www.un.org/sg/en/content/statement/2017-05-14/statement-attributable-spokesman-secretary-general-attacks-against>

Alex Yablon, *“American Guns Drive the Migrant Crisis that Trump Wants to Fix with a Wall”* (Trace, May 25, 2017) <https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/>

Jonathan Blitzer, *“The Link Between America’s Lax Gun Laws and the Violence That Fuels Immigration”* (New Yorker, March 22, 2018),

<https://www.newyorker.com/news/news-desk/the-link-between-americas-lax-gun-laws-and-the-violence-that-fuels-immigration>

See: “*Clear and Present Danger: National Security Experts Warn about the Danger of Unrestricted Sales of 50 Caliber Anti-Armor Sniper Rifles to Civilians*” (Violence Policy Center, July 2005), <http://www.vpc.org/studies/50danger.pdf>

ITAR should focus more attention on the security needs of local communities where firearms are proposed to be exported.

The Department of State is liberalizing its rules on firearm exports partly because the Department of Defense has determined that so-called semi-automatic firearms are of diminished importance in military conflicts. DoD’s determination may well be valid, but it misses the point. Military analysts worry, as they should, about the impact of weapons on the battlefield. But evaluating the impact of firearms on the battlefield gives short shrift to the security needs of civilian communities. To support the rule of law we must consider the impact of firearms on public safety, peace officer safety, crime control, and the prevention and management of civil disturbances. Firearms that “no longer warrant control” by the military may nonetheless overwhelm police patrols and threaten the rule of law in local communities.

ITAR should not treat the US firearms market as the global standard. The United States is proposing to liberalize its rules on firearm exports grounded partly on the false premise that firearms are “widely available in retail outlets ... abroad.” That is not true. The US firearms market is unique. Mexico, for example, has more restrictive gun laws than the United States.

See: Topher McDougal, David A. Shirk, Robert Muggah and John H. Patterson, “*The Way of the Gun: Estimating Firearms Traffic Across the US-Mexico Border*” (Trans-Border Institute, University of San Diego, March 2013), https://igarape.org.br/wp-content/uploads/2013/03/Paper_The_Way_of_the_Gun_web2.pdf

Zachary Elkins, Tom Ginsburg & James Melton, “*US Gun Rights Truly Are American Exceptionalism*”, (Bloomberg, March 7, 2013), <https://www.bloomberg.com/view/articles/2013-03-07/u-s-gun-rights-truly-are-american-exceptionalism>

The United States risks alienating friendly foreign nations by projecting its permissive domestic gun laws abroad.

The Department of State has access to information about what kinds of weapons are typically carried by patrol officers in foreign countries. The Department has the wherewithal to judge whether a firearm proposed for export is likely to outmatch the firearms carried by local police forces. The Department should use that knowledge -- and make that judgment -- as it evaluates firearm export applications.

In evaluating the suitability of firearm exports, the ITAR should set a maximum limit on the destructive potential of firearms exportable to civilians. Firearms with muzzle energies higher than, for example, 5,000 Joules should be barred from export to non-government end-users. (In ballistics, muzzle energy, commonly expressed in Joules or foot-pounds, is a measure of the destructive potential of a firearm or cartridge.) The risk that a firearm poses to life and property -- and the danger it poses to police officers -- depends rather more on the firearm's destructive potential and rather less on whether the firearm is automatic, semi-automatic, non-automatic, not-fully-automatic, or over- or under .50-caliber.

Highly destructive weapons should be off-limits for export to civilians. Whatever short-term economic benefit those exports may generate is outweighed by the risk those weapons pose to the safety of peace officers and the rule of law. No firearm with a muzzle energy of 5,000 J belongs on a street anywhere in the world.

Policy Recommendations

The following changes should be incorporated in ITAR:

1. Applications for firearm export licenses should be denied when the firearm proposed for export is of such destructive potential as to threaten the safety of local law enforcement officers.
2. Prohibit exports of firearms with muzzle energies less than 5,000 J, to civilian end-users, world-wide, if the firearm is likely to outmatch weapons carried by local peace officers or otherwise impair the efforts of peace officers to control crime and civil disturbance.
3. Prohibit export of firearms with muzzle energies above 5,000 J to civilian end-users world-wide.

Technical Language

The recommendations above may be translated into the ITAR framework using the technical language below.

(1)

22 CFR 120.4

Add a Note 3 to 22 CFR 120.4 as follows:

FOR FIREARMS AND AMMUNITION, PERFORMANCE CAPABILITY INCLUDES DESTRUCTIVE POTENTIAL, AS MEASURED BY MUZZLE ENERGY, COMMONLY EXPRESSED IN JOULES OR FOOT-POUNDS.

(2)

22 CFR 121.1, Category I

Add Note 3 to Category I of 22 CFR 121.1 as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM

SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(b) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(c) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(3)

22 CFR 121.1, category II

Add a Note 3 to category II of 22 CFR 121.1, paragraph (a), as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY

RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(b) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(c) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(4)

22 CFR 121.1, category III

Add a new paragraph 4 to notes to category III of 22 CFR 121.1, as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL

GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(b) A LICENSE APPLICATION FOR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(c) AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS) MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(5)

15 CFR 124.14 (c) (9)

Amend 15 CFR 124.14 (c) (9) as follows:

(a) Unless the articles covered by the agreement are in fact intended to be distributed to private persons or entities (e.g., cryptographic devices and software for financial and business applications), the following clause must be included in all warehousing and distribution agreements: “Sales or other transfers of the licensed article shall be limited to governments of the countries in the distribution territory and to private entities seeking to procure the licensed article pursuant to a contract with a government within the distribution territory, unless the prior written approval of the U.S. Department of State is obtained.

(b) SUBJECT TO (c) AND (d), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(c) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED

EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(d) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(6)

22 CFR Part 126, Supplement No. 1

In 22 CFR Part 126, Supplement No. 1, category I (a-e) (firearms and related articles), mark all three country boxes with an X.

In 22 CFR Part 126, Supplement No. 1, category II (a) (guns and armament), mark all three country boxes with an X.

In 22 CFR Part 126, Supplement No. 1, category III (ammunition and ordinance), mark all three country boxes with an X.

(7)

22 CFR 129.7 (b)

Amend 22 CFR 129.7 (b) to add the following:

(b) No person may engage in or make a proposal to engage in brokering activities that involve any country, area, or person referred to in § 126.1 of this subchapter without first obtaining the approval of the Directorate of Defense Trade Controls. NO PERSON MAY ENGAGE IN OR MAKE A PROPOSAL TO ENGAGE IN BROKERING ACTIVITIES THAT INVOLVE EXPORTING OR TRANSFERRING, TO A NON-GOVERNMENT PERSON, A FIREARM OR AMMUNITION WITH MUZZLE ENERGY GREATER THAN 5,000 JOULES (3,688 FOOT-POUNDS), OR ASSOCIATED EQUIPMENT. NO PERSON MAY ENGAGE IN OR MAKE A PROPOSAL TO ENGAGE IN BROKERING ACTIVITIES THAT INVOLVE EXPORT OR TRANSFER, TO A NON-GOVERNMENT PERSON, OF A FIREARM OR AMMUNITION WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS) OR ASSOCIATED EQUIPMENT IF THE ITEM IS LIKELY TO OUTMATCH LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE ARTICLE WOULD BE AUTHORIZED FOR USE.

Thank you for the opportunity to submit comments on the ITAR amendment.

Sincerely,

William A. Root
Erick Williams

PUBLIC SUBMISSION

As of: 7/10/18 2:34 PM
Received: July 06, 2018
Status: Posted
Posted: July 10, 2018
Tracking No. 1k2-944p-j11q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0188

Public comment 109 . NRA C. Zealand 7-6-18

Submitter Information

Name: NRA ILA

Address:

11250 Waples Mill Rd
Fairfax, VA, 22030

General Comment

See attached file(s)

Attachments

Export-Reform_Cats. I-III_Final

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030



July 6, 2018

Mr. Robert Monjay
Office of Defense Trade Controls
United States Department of State
2401 E Street, Northwest
Washington, District of Columbia 20226

Via Online Submission: <https://www.regulations.gov/docket?D=DOS-2017-0046>

Re: **Docket No. DOS-2017-0046; RIN 1400-AE30; International Traffic in Arms
Regulations: U.S. Munitions List Categories I, II, and III**

Dear Mr. Monjay:

I am writing on behalf of the National Rifle Association (NRA) to provide the association's comments on the above proposed rule (the proposal). With some six million dues-paying members, the NRA is America's premier defender of the civil right protected by the Second Amendment. Our members include individuals and businesses that would be directly affected by the changes in the proposal, including gunsmiths, firearm instructors, journalists and writers covering firearm technology and development, hunters, competitive shooters, and manufacturers.

The NRA is very pleased to see that the project of Export Reform has finally circled back to the place where it began, with proposed amendments to Categories I, II, and III of the U.S. Munitions List (USML). These were among the first of the changes planned for the large-scale undertaking to update export controls on dual-use items, and rightly so. The Second Amendment protects an individual right to possess and carry firearms in case of confrontation, extending to

arms in common use among the population for lawful purposes.¹ America boasts hundreds of millions of privately-owned firearms² and a robust “gun culture” that has produced countless books, magazine articles, videos, websites, online forums, etc., that exhaustively detail firearm technology and use. It is difficult to imagine any information about the design, development, production, manufacturing, and use of firearms that is not already within the public domain. This same information is commonly available overseas, as are the types of firearms and ammunition the proposal would move off the USML and onto the Commerce Control List (CCL). Meanwhile, the might and sophistication of the U.S. military – as well as America’s armed populace – ensure that no foreign enemy wielding the type of arms at issue in these proposed amendments to the USML could pose a serious threat to this nation’s security.

Of course, movement of commonly-available firearms and ammunition to the CCL would not leave their export unregulated. America already has one of the most well-established and closely-administered systems of regulation for commercial production and distribution of firearms and ammunition in the world, and the proposal would not change that. It is clear from the companion rulemaking published by the Commerce Department that items moving off the USML would remain closely controlled, with the necessity of export licenses remaining the norm. Foreign individuals’ access to firearms and ammunition would also remain regulated under the federal Gun Control Act and the National Firearms Act. Furthermore, the Commerce Department has long regulated exports of various shotguns, as well as their parts, components, accessories, and ammunition. Thus, it has existing knowledge of and relationships with many of the entities the proposal will affect. Those entities, in turn, will also have some familiarity with the Department’s regulatory environment and procedures.

The NRA believes that, on the whole, the proposal correctly balances the imperatives of national and global security, allocation of oversight resources, and promotion of American industry, innovation, and competitiveness. We do, however, think it could be improved in several particulars. We also believe that the timing for the implementation of the rule deserves careful consideration.

Specifically, our concerns involve the following:

- **The retention of firearm sound suppressors on the USML is contrary to the guiding principles of Export Reform and does not serve its purposes.** Suppressors should also be moved to the CCL, unless they are specifically designed for use only with firearms that remain on the USML.

¹ *District of Columbia v. Heller*, 554 U.S. 570, 592, 624-25 (2008). *See also McDonald v. Chicago*, 561 U.S. 742 (2010) (Second Amendment right to keep and bear arms is fully incorporated against state and local action by virtue of the Fourteenth Amendment).

² The Small Arms Survey estimates that as of the end of 2017, there were 121 firearms for every 100 residents in the U.S., for a total of some 393.2 million guns. The program director for the Small Arms Survey Institute notes, however, that “there is no direct correlation at the global level between firearm ownership and violence.” *See* Edith M. Lederer, “Global survey shows more than 1 billion small arms in world, mostly owned by civilians and mostly in the U.S.,” *ChicagoTribune.com*, June 18, 2018, <http://www.chicagotribune.com/news/nationworld/ct-survey-small-arms-world-civilians-20180618-story.html>.

- **The designation of “high capacity magazines” that would remain on the USML is based on an arbitrary number, rather than any qualitative difference in the technology or military character of the item.** The governing consideration should be whether they are specifically designed for use only with firearms that remain on the USML, not their capacity.
- **Where manufacturers and exporters need to implement new compliance procedures for items moving from the USML to the CCL, the final rule should have a delayed implementation date; where requirements that once pertained under the International Traffic in Arms Regulations (ITAR) have no analogues under the Export Administration Regulations (EAR), the changes should take effect immediately.**

For these reasons, and as detailed below, the NRA supports the proposal but advocates for minor revisions before its publication as a final rule.

I. Firearm Sound Suppressors, As Such, Do Not Meet the Prerequisites for Control on the USML Articulated by the Proposal and Therefore Should be Controlled Under the CCL.

As noted in its supplementary information, the proposal is part of a longstanding effort to “revise the U.S. Munitions List so that its scope is limited to those defense articles that provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use.” Whether or not sound suppressors for firearms are characterized as “weapons,” there is no plausible argument that the devices meet these standards.

A firearm sound suppressor is basically a metal cylinder surrounding internal baffles that slow and cool escaping gas to decrease the volume of the firearm’s muzzle report. The devices reduce, but do not eliminate, the sound of gunshots.³ Suppressors have been commercially available since the first decade of the 1900s.⁴ The technology necessary to produce them is simple and well-understood throughout the developed world. Detailed design, development, production, and manufacturing information for firearm sound suppressors is pervasively available in the public domain, including on the Internet.⁵ Similar devices are used to moderate the sound of various other consumer products powered by internal combustion, including automobiles, chainsaws, and lawnmowers.

³ Glenn Kessler, “Are firearms with a silencer ‘quiet’?” WashingtonPost.com, March 20, 2017, https://www.washingtonpost.com/news/fact-checker/wp/2017/03/20/are-firearms-with-a-silencer-quiet/?noredirect=on&utm_term=.301e14951dd4.

⁴ Stephen Halbrook, “Firearm Sound Moderators: Issues of Criminalization and the Second Amendment,” 46 Cumb. L. Rev. 33, 42 (2015).

⁵ A quick web browser search will reveal numerous webpages and videos offering detailed instructions on constructing suppressors of various levels of sophistication, from products produced with lathes and other machine tools to improvised models made from such materials as PVC, flashlight tubes, oil filters, and solvent traps. There’s even a detailed suppressor schematic on the ATF’s own website: <https://www.atf.gov/file/silencer-cut-away>.

Suppressors do not provide the United States with any critical military or intelligence advantage. They are not unique to the United States and are in fact the rare type of firearm-related product that historically has been regulated more closely in this country than in a number of other countries with otherwise relatively strict gun control laws. In some foreign countries, there are no special requirements to acquire or possess firearm suppressors; in certain others, they are presumptively available to those with a firearm license.⁶ Firearm suppressors are already in use by military forces, law enforcement agencies, and civilian firearm owners across the world. Simply put, any country sophisticated enough to produce firearms is sophisticated enough to produce firearm sound suppressors.

Firearm sound suppressors, by themselves, are harmless and cannot accurately be classified as “weapons.” They are only useful when actually attached to a firearm. Even then, they do not make the firearm any more lethal. Their primary advantage is to protect the hearing of the firearm’s user and to decrease the sound signature of firearms so their use is less noticeable and has fewer collateral effects on those in vicinity of the firearm’s discharge.

And even assuming, for the sake of argument, suppressors could be characterized as “weapons,” they are not “inherently military.” Suppressors are regulated and taxed under U.S. law,⁷ but they are readily available to those who are legally eligible to own firearms. They are lawful for private possession in 42 states and may be lawfully used for hunting in 40 states.⁸ Suppressors adorn the firearms of plinkers, hunters, competitors, and law enforcement officers. According to the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), there were 1,297,670 suppressors registered under the National Firearms Act as of February 3, 2017, with nearly 400,000 such registrations occurring in the 12 months preceding that date alone.⁹ As previously mentioned, suppressors are also commonly used by law enforcement agencies and private firearm owners in other countries as well.

In its current form, the proposal does not differentiate between suppressors for use on firearms that would be regulated under the USML and those that would not. This could mean that firearms that would otherwise be regulated under the CCL will remain on the USML because they have integrated suppressors. It could also mean that firearm instructors would have to refrain from allowing suppressors to be used in their classes for fear of providing unauthorized “defense services.” This is contrary to the spirit and intent of Export Reform and does nothing to further U.S. or international security interests.

Given that there is no special military or national security significance to firearm sound suppressors, there is no convincing argument for retaining them on the USML. Like flash suppressors, they should be generally subject to the CCL. If they are going to be retained on the USML at all, it should only be to the extent that they are “specially designed” for the firearms

⁶ 46 Cumb. L. Rev. at 72-4.

⁷ See National Firearms Act, 26 U.S.C. §§ 5801-5872; Gun Control Act, 18 U.S.C. §§ 921-931.

⁸ American Suppressor Association, Education Webpage, <https://americansuppressorassociation.com/education/> (last visited July 6, 2018).

⁹ Stephen Gutowski, “ATF: 1.3 Million Silencers in U.S. Rarely Used I Crimes,” FreeBeacon.com, Feb. 17, 2017, <http://freebeacon.com/issues/atf-despite-nearly-1-3-million-silencers-united-states-rarely-used-crimes/>.

that would also continue to be so controlled. Because that distinction would be difficult to administer as a practical matter, however, the best option is simply to control the general category of firearm sound suppressors under the CCL.

II. The Proposal's Treatment of Magazines is Arbitrary and Capricious.

The proposal treats magazines as “high capacity” and therefore subject to the USML if they have a capacity of greater than 50 rounds, “regardless of jurisdiction of the firearm.” It offers no explanation for this threshold. Whatever the thinking behind it may be, a 51-round magazine provides no greater critical military or intelligence advantage than a magazine of lesser capacity, nor is it any more inherently for military end use.

Magazines, whatever their capacity, are among the most simple and utilitarian of firearm-related items. In typical form, they consist of a metal box or tube with a floor plate that contains a spring with a follower at the top. A firearm that can accept a detachable magazine can accept a magazine of virtually any size. All that is necessary to create a magazine of greater capacity is a longer box and spring. Drum magazines typically utilize a cylindrical chamber and a wound spring or ratcheting mechanism to allow for greater capacity in a more compact unit, but neither configuration uses sophisticated or closely-held technology. Like firearm sound suppressors, technical data for magazines with capacities above and below 51 rounds is available in the public domain, including online, and has been since at least the early 20th Century.¹⁰

United States law does not limit the capacity of magazines for any sort of firearm available to private citizens (a handful of states, however, do impose magazine capacity limits, typically of 10 rounds). Magazines with capacities in excess of 50 rounds are readily available on the commercial market. They are used by practical shooting competitors, as well as by many gun owners who appreciate the versatility and convenience they provide. Even BB guns for the youth market that use springs or compressed air often have reservoirs that hold hundreds of rounds. While these non-powder guns obviously are not and would not be defense articles under the proposal, their capacity demonstrates the fact that marksmen of all types appreciate the ability to operate their guns without frequent reloading.

Demonstrating the arbitrary nature of controlling magazines based on their capacity is the fact that they can easily be clipped, taped, or otherwise attached to one another, with reloads accomplished in mere moments.

As with sound suppressors, it makes no sense that a given curriculum of firearm instruction that would otherwise be uncontrolled under the proposal could potentially be re-characterized as a “defense service” if it happened to involve a “large capacity” magazine.

¹⁰ See, e.g., European Patent Office Patent No. 8172, “A New or Improved Cartridge Magazine for Small Arms and Machine Guns,” Accepted March 6, 1919 (providing detailed specifications for a drum-type magazine), available at <https://worldwide.espacenet.com/publicationDetails/originalDocument?CC=GB&NR=191508172A&KC=A&FT=D&ND=3&date=19190306&DB=EPODOC&locale=en> (last visited July 6, 2018).

For these reasons, we recommend that firearm magazines be controlled under the CCL. If they are controlled under the USML at all, it should only be to the extent they “specially designed” solely for firearms that remain on the USML.

III. The Final Rule Should Take Effect Immediately to the Extent Requirements Are Eliminated and Phase in Other Changes to Allow Regulated Entities Time to Adapt.

When the final rule governing Categories I, II, and III of the USML is published, certain changes should take effect immediately, while others should be phased in to allow regulated entities time to adapt.

Changes that merely eliminate requirements altogether should take effect immediately. For example, there is no justification for continuing to make “manufacturers” of articles that would be moved off the USML register with the Department of State.

On the other hand, where control of an item changes from the USML to the CCL, necessitating new procedures by the regulated entity, implementation of the final rule’s effective date should be delayed to allow for new compliance systems to be established.

Licenses granted under the ITAR should also be grandfathered for all outstanding transactions.

The NRA does not have any specific recommendations for a timeline of implementation for enforcing new requirements and procedures. We will defer to the entities whose day-to-day operations will be directly affected by the changes in the final rule.

Conclusion

The NRA is very pleased to see Export Reform finally turn its attention to Categories I, II, and III of the USML. The proposal charts a positive course that will contribute to national security, enhance the competitiveness of U.S. businesses, and benefit ordinary gun owners by mitigating the potential for the ITAR to burden innocent conduct that does not implicate national security. We hope you will take the suggestions offered herein seriously to further promote the worthy goals of this effort, and we appreciate the opportunity to provide input.

We have also included our submission on the Bureau of Industry and Security’s companion rulemaking and incorporate those comments herein by this reference.

Sincerely,



Christopher Zealand
Senior Research Attorney
NRA-ILA

NATIONAL RIFLE ASSOCIATION OF AMERICA
INSTITUTE FOR LEGISLATIVE ACTION
11250 WAPLES MILL ROAD
FAIRFAX, VIRGINIA 22030



July 6, 2018

Regulatory Policy Division
Bureau of Industry and Security
United States Department of Commerce
14th Street and Pennsylvania Avenue, Northwest
Washington, District of Columbia 20230

Via Online Submission: <https://www.regulations.gov/document?D=BIS-2017-0004-0001>

Re: **Docket No. BIS-2017-0004; RIN 0694-AF47; Control of Firearms, Guns,
Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)**

Greetings:

I am writing on behalf of the National Rifle Association (NRA) to provide the association's comments on the above proposed rule (the proposal). With some six million dues-paying members, the NRA is America's premier defender of the civil right protected by the Second Amendment. Our members include individuals and businesses that would be directly affected by the changes in the proposal, including gunsmiths, firearm instructors, journalists and writers covering firearm technology and development, hunters, competitive shooters, and manufacturers.

The NRA is very pleased to see that the project of Export Reform has finally circled back to the place where it began, with proposed amendments to Categories I, II, and III of the U.S. Munitions List (USML). These were among the first of the changes planned for the large-scale undertaking to update export controls on dual-use items, and rightly so. The Second Amendment protects an individual right to possess and carry firearms in case of confrontation, extending to

arms in common use among the population for lawful purposes.¹ America boasts hundreds of millions of privately-owned firearms² and a robust “gun culture” that has produced countless books, magazine articles, videos, websites, online forums, etc., that exhaustively detail firearm technology and use. It is difficult to imagine any information about the design, development, production, manufacturing, and use of firearms that is not already within the public domain. This same information is commonly available overseas, as are the types of firearms and ammunition the proposal would regulate under the Commerce Control List (CCL). Meanwhile, the might and sophistication of the U.S. military – as well as America’s armed populace – ensure that no foreign enemy wielding the types of arms at issue in these proposed regulations could pose a serious threat to this nation’s security.

Of course, movement of commonly-available firearms and ammunition to the CCL would not leave their export unregulated. America already has one of the most well-established and closely-administered systems of regulation for commercial production and distribution of firearms and ammunition in the world, and the proposal would not change that. It is clear from the proposal that items moving off the USML would remain closely controlled, with the necessity of export licenses remaining the norm. Foreign individuals’ access to firearms and ammunition would also remain regulated under the federal Gun Control Act and the National Firearms Act. Furthermore, the Commerce Department has long regulated exports of various shotguns, as well as their parts, components, accessories, and ammunition. Thus, it has existing knowledge of and relationships with many of the entities the proposal will affect. Those entities, in turn, will also have some familiarity with the Department’s regulatory environment and procedures.

The NRA believes that, on the whole, the proposal correctly balances the imperatives of national and global security, allocation of oversight resources, and promotion of American industry, innovation, and competitiveness. We do, however, think that it could be improved in several particulars. We also believe that the timing for the implementation of the rule deserves careful consideration.

Specifically, our concerns involve the following:

- **§ 740.9 Temporary imports, exports, reexports, and transfers (in-country) (TMP) and § 758.10 Entry clearance requirements for temporary imports – The use of the Automated Export System (AES) is impractical and inappropriate for private travelers exporting a personal firearm they temporarily imported into the U.S. for**

¹ *District of Columbia v. Heller*, 554 U.S. 570, 592, 624-25 (2008). See also *McDonald v. Chicago*, 561 U.S. 742 (2010) (Second Amendment right to keep and bear arms is fully incorporated against state and local action by virtue of the Fourteenth Amendment).

² The Small Arms Survey estimates that as of the end of 2017, there were 121 firearms for every 100 residents in the U.S., for a total of some 393.2 million guns. The program director for the Small Arms Survey Institute notes, however, that “there is no direct correlation at the global level between firearm ownership and violence.” See Edith M. Lederer, “Global survey shows more than 1 billion small arms in world, mostly owned by civilians and mostly in the U.S.,” *ChicagoTribune.com*, June 18, 2018, <http://www.chicagotribune.com/news/nationworld/ct-survey-small-arms-world-civilians-20180618-story.html>.

lawful purposes. The current system, which relies upon the ATF Form 6NLA, should be maintained without modification for such persons.

- **§ 740.14 Baggage (BAG) and § 758.1 The Electronic Export Enforcement (EEI) filing to the Automated Export System (AES) – The use of the AES is impractical and inappropriate for private travelers temporarily exporting a personal firearm for lawful purposes.** The current system, which relies upon the CBP Form 4457, should be maintained without modification for such persons until such time as U.S. Customs and Border Protection engages in a public rulemaking process to resolve the current problems.
- **§ 758.1 The Electronic Export Enforcement (EEI) filing to the Automated Export System (AES) and § 762.2 Records to be retained – Expanding the data elements necessary for AES filings would exacerbate the problems for private travelers temporarily exporting a personal firearm and violate the spirit of Congressional prohibitions against federal firearm registries.** Private travelers temporarily exporting personal firearms should continue to be able to use the CPB Form 4457 without the firearm's information being captured by a federal database.
- **Where manufacturers and exporters need to implement news compliance procedures for items moving from the USML to the CCL, the final rule should have a delayed implementation date; where requirements that once pertained under the International Traffic in Arms Regulations (ITAR) have no analogues under the Export Administration Regulations (EAR), the changes should take effect immediately.**

For these reasons, and as detailed below, the NRA supports the proposal but advocates for revisions before its publication as a final rule.

I. The AES System is Impractical and Inappropriate for Use by Private Travelers.

- A. The AES requirement was introduced without sufficient or accurate notice to the public.

The International Traffic in Arms Regulations historically had included an exemption under 22 CFR §123.17(c) that allowed U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges therefor. This exemption was geared toward hunters, sportsmen, competitors, and others who travel overseas with firearms to be used for sporting and other lawful purposes.

In 2011, DDTC published a Federal Register notice of proposed rulemaking entitled International Traffic in Arms Regulations: Exemption for Temporary Export of Chemical Agent Protective Gear.³ The supplementary information to that rulemaking focused on amendments to 22 CFR §123.17 pertaining to “the temporary export of chemical agent protective gear for

³ 76 Fed. Reg. 16353 (March 23, 2011).

exclusive personal use” It also mentioned that “an exemption for firearms and ammunition is clarified by removing certain extraneous language that does not change the meaning of the exemption.”⁴

In fact, the proposed change to the firearms and ammunition exemption was a material and substantial change to the status quo. It would require for the first time that “the individual must ... present the Internal Transaction Number (ITN) from submission of the Electronic Export Information in the Automated Export System per § 123.22(b)” to use the exemption.⁵

But because the notice only printed the amendments to 22 CFR §123.17 and omitted the existing text of that section, it was not clear from the face of that notice what the context of this new requirement was. The notice’s inaccurate portrayal of the change as a mere “clarification” further contributed to obscuring the significance of this new language. Thus, the new requirement for temporary firearms and ammunition exports went largely unnoticed by relevant stakeholders.

The final rule was published on May 2, 2012.⁶ Its supplementary information included a similarly inaccurate description of the firearm exemption amendment. “Section (c)(3) is revised to remove what is in practice extraneous language,” it stated.⁷ “Subject to the requirements of (c)(1)–(3), the exemption applies to all eligible individuals (with the noted exceptions). Thus, while the text is revised, the meaning of (c)(3) is not changed.”⁸

Unlike the notice for the proposed rule, however, the notice of the final rule included the full text of subsection (c), which made clear the AES filing requirement pertained to those claiming the licensing exemption for temporary firearm and ammunition exports. Of course, it was by then too late for stakeholders to object to these changes, as the rule had been finalized.

For three years, the changes to 22 CFR §123.17 as they pertained to temporary firearm and ammunition exports appeared to be ignored and unenforced by the federal government. Then, in 2015, U.S. Immigration and Customs Enforcement (ICE) and U.S. Customs and Border Protection (CBP) suddenly changed their websites to indicate the AES filing requirements would be enforced against travelers temporarily exporting firearms and ammunition, with penalties that could include seizure of improperly declared items and criminal prosecution.⁹

⁴ *Id.*

⁵ *Id.* at 16354.

⁶ Amendment to the International Traffic in Arms Regulations: Exemption for Temporary Export of Chemical Agent Protective Gear, 77 Fed. Reg. 25865-01 (May 2, 2012).

⁷ *Id.*

⁸ *Id.*

⁹ See NRA-ILA, “Rule Change May Devastate International Travel for Hunters and Shooters,” <https://www.nra.org/articles/20150320/rule-change-may-devastate-international-travel-for-hunters-and-shooters> (March 20, 2015).

B. The AES was not designed for use by private persons for non-business purposes.

The AES was designed around the needs of commercial exporters and government officials, not private travelers. As CBP's "Introduction" to the AES states:

During AES development, a Trade Resource Group convened regularly. To ensure that all voices were heard, the group was comprised of large and small exporters, carriers, freight forwarders, port authorities, and non-vessel operating common carriers (NVOCC). At the trade's request, separate coalitions for exporters and software vendors were formed.^[10]

It continues, "Whatever aspect of the export community you represent - exporter, carrier, freight forwarder, port authority, service center, non-vessel operating common carrier, consolidator - AES has advantages for you."¹¹ Nowhere does this summary recognize that private individuals would also have to navigate a system designed by and for industry compliance specialists.

Individuals attempting to use the AES will need to have compatible hardware and software systems or to enlist the services of an authorized agent. Those who do not wish to purchase or write their own software, or hire someone to complete the filing process for them, have the option of using AESDirect, an online version administered by the U.S. Census Bureau.

That agency, in turn, has a webpage with various resources to acquaint users with the intricacies of the system.¹² Browsers can start, for example, with the 39-page *AESDirect User Guide*¹³ or with any of the one-hour-plus webinars that cover various aspects of the system.

Navigating the filing process requires individuals to create an account and then fill in data fields with various codes that are neither intuitive nor easily reconcilable with the context of an individual traveling with his or her own private property. For example, the system requires the parties to an export to be identified, with required fields that include the U.S. Principal Party in Interest, which must be identified by "Company Name" and an acceptable ID type. Likewise, the Ultimate Consignee also must be specified, again with reference to "Company Name" and an authorized form of identification.

Nowhere does the User Guide or the screens of the system itself explain how these categories are supposed to translate for private individuals declaring temporary exports of their

¹⁰ U.S. Customs and Border Protection, "AES: An Introduction," <https://www.cbp.gov/trade/aes/introduction> (last visited July 6, 2018).

¹¹ *Id.*

¹² U.S. Census Bureau, "ACE AESDirect - Resources," https://www.census.gov/foreign-trade/aes/aesdirect/transitiontoace.html?cm1=gd&utm_medium=email&utm_source=govdelivery (last visited July 6, 2018).

¹³ Available at <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf> (last visited July 6, 2018).

own property. Such persons are not just an afterthought in the system's design. Rather, it appears that the design has not thought of them at all.

The acceptable forms of identification, for example, are an Employer Identification Number (EIN), a Dun and Bradstreet Number, or a foreign passport number (if the foreign entity is in the U.S. at the time the goods are purchased or obtained for export). U.S. individuals making temporary exports cannot use their own passport numbers, nor can they use their Social Security numbers.¹⁴

Using AESDirect, moreover, requires an individual to apply for an account with the Secure Data Portal of the Automated Commercial Environment. The application for an ACE Exporter Account¹⁵ requires users to list "Corporate Information," including an EIN and Company Name.

The Internal Revenue Service (IRS) is responsible for issuing EINs. The IRS website that explains the process for applying online clearly states: "Employer Identification Numbers are issued for the purpose of tax administration and are not intended for participation in any other activities."¹⁶ The online application requires the applicant to identify the "legal structure" associated with the EIN. None of the available options corresponds with a private individual who simply wishes to make an AES filing. The applicant then must specify why he or she is requesting an EIN, with the limited menu choices again offering no option for the private AES filer. Finally, the applicant must certify under penalties of perjury that he or she has "examined this application, and to the best of my knowledge and belief, it is true, correct, and complete."¹⁷

Private individuals using the online application form, in other words, must make a false certification to the IRS about their business need for an EIN as a prerequisite to complying with the legally-mandated AES filing requirement. These individuals are also potentially creating an expectation with the IRS that they are creating a business that should have associated tax filings.

C. The relevant agencies have been aware of the problems private individuals have using the AES, and there has been no apparent progress in resolving them.

In 2015, representatives of the NRA – as well as representatives of hunting and firearm industry associations – met with officials from CBP, the Census Bureau, the Department of

¹⁴ See U.S. Customs and Border Protection, "Change in Automated Export System (AES) exporter ID filing requirement," https://hcbp.cbp.gov/app/answers/detail/a_id/1145/kw/EIN%20number%20needed%20for%20export (last visited July 6, 2018).

¹⁵ Available at https://ace.cbp.dhs.gov/acepub/acepub_Apps/ExporterAccountApplication/expForm.php (last visited July 6, 2018).

¹⁶ IRS, "Apply for an Employer Identification Number (EIN) Online," <https://www.irs.gov/businesses/small-businesses-self-employed/apply-for-an-employer-identification-number-ein-online> (last visited July 6, 2018).

¹⁷ See IRS Form SS-4, available at <https://www.irs.gov/pub/irs-pdf/ss4.pdf> (last visited July 6, 2018). Note the PDF of the SS-4 has options for "Other (specify)" not available on the IRS's online application form. It does not, however, indicate that EINs may be obtained solely for AES filing purposes.

Homeland Security (DHS), and ICE to discuss the above problems.¹⁸ These discussions emphasized the need for a simple, straightforward, and legal means for private travelers to comply with their AES filing requirements. The discussions also touched on concerns about creating a federal firearm registry via AES filings (a topic that is explored below in greater depth).

Shortly after that meeting, and after additional intervention from members of Congress, CBP announced that it would return to the status quo practice of using the paper CBP Form 4457 to track firearms for temporary export.¹⁹ In this procedure, travelers report to a CBP office during their trip or beforehand at a Port of Entry and present the firearms (and ammunition, if applicable) to be recorded on the 4457. Upon return to the U.S., the traveler will declare the property, which can be checked, if necessary, against the 4457 to ensure the same firearms that left the country have returned. The ATF has also indicated that this procedure will satisfy the re-importation of firearms under its importation jurisdiction.²⁰

We understand that this remains the procedure for temporary firearm exports by private travelers to the present day and that the AES filing requirement is not being enforced against these individuals.

Between 2015 and the present, NRA representatives have had repeated contacts with officials from CBP and the Census Bureau to inquire about any changes or updates to the above-described state of affairs. To date, we have neither seen nor heard of any evidence that the AES system has been in any way modified to alleviate the problems it presents for private travelers. Our review of the applicable websites during the preparation of these comments confirms this impression. The AES remains a complex application geared toward the needs of industry and government, not private persons traveling with their own property for non-business purposes.

- D. BIS should omit the AES filing requirement for private persons temporarily exporting their own firearms and ammunition for lawful purposes and codify the Form 4457 procedure.

The NRA is pleased to see that BIS' current proposal is handling the AES issue in a much more transparent and forthright manner than the 2012 DDTC rulemaking that introduced it in the first place. The background information included with the proposal acknowledges:

BIS is aware that U.S. Customs and Border Protection (CBP) has temporarily suspended the requirement to file EEI to the AES for personally-owned firearms and ammunition that are "subject to the ITAR" being exported under 22 CFR 123.17(c), due to

¹⁸ See NRA-ILA, "You Can't Get There from Here: Obama Administration Shrugs Off Woes of International Travelers," <https://www.nra-ila.org/articles/20150417/you-cant-get-there-from-here-obama-administration-shrugs-off-woes-of-international-travelers> (April 17, 2015).

¹⁹ See, e.g., P.J. Reilly, "U.S. Government withdraws confusing new gun rules for traveling hunters," LancasterOnline, April 27, 2015, https://lancasteronline.com/news/local/u-s-government-withdraws-confusing-new-gun-rules-for-traveling/article_e2991fcc-ecce-11e4-8e21-3b622f277d23.html.

²⁰ See 27 C.F.R. § 478.115(a).

operational challenges related to implementation. ... Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP's existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition.

As explained above, the CBP and the other relevant agencies have not updated their processes to allow for individuals to easily file Electronic Export Information in the AES. Given that they are aware of the issues, have had more than three years to fix them, and have made no discernable progress in that direction, there is no reason to believe they will do so by the time the proposal is published as a final rule.

The NRA is unaware of any compelling security need to change the status quo. The very fact that the systems have not been updated to address the outstanding issues would seem to indicate CBP and DHS agree. Simply put, there has been no urgency to facilitate AES filings by private travelers. The Form 4457 procedure has proven to be a workable system both before and since the 2012 rule change, and it can continue to suffice for the near term.

The paper Form 4457 also serves an important function for some U.S. travelers to foreign countries that require a valid "firearm license" from visitors' home countries. Neither the U.S. government nor most U.S. states generally license the acquisition or simple possession of firearms, especially long guns. But foreign officials in these countries have historically accepted the Form 4457 as fulfilling this requirement.

It is also relevant that BIS has throughout the relevant time period always allowed for the temporary export of shotguns and shotgun shells under its jurisdiction via the baggage exemption of 15 C.F.R. § 740.14 without requiring a declaration to be filed in the AES. Indeed, that exemption currently does not specifically require the use of the Form 4457 procedure, either. Codifying the Form 4457 procedure would therefore help promote consistency and understanding across the different agencies involved in enforcing the nation's export rules and with the traveling public. The president's determination that certain additional firearms and ammunition no longer warrant control under the USML more strongly argues in favor of BIS adopting its own procedures for their temporary export than for importing procedures from the ITAR into the EAR.

CBP can also issue its own rulemaking on procedures for temporary exports by private travelers, should the state of play change with respect to the practical and technological issues of the AES. The issue could then be fully vetted in its own right. There is no reason, however, to inject this thorny issue into the larger project of Export Reform. It is not necessary nor helpful to the objectives of Export Reform, and it would perpetuate a problem one solution to which has already been identified (i.e., the paper Form 4457 procedure).

- E. Private travelers exporting a personal firearm they temporarily imported into the U.S. for lawful purposes should not be required to use AES for this purpose.

The same problems that arise from requiring U.S. persons to file declarations through the AES to take advantage of the BAG exemption apply to requiring foreign visitors traveling to the U.S. with their own firearms to use the AES to avail themselves of the TMP exception. This is not necessary under the current version of 15 C.F.R. § 740.9, and it should not be added to that section or to § 758.1.

Currently, foreign visitors traveling to the U.S. with their own firearms must apply for an import permit from the Bureau of Alcohol, Tobacco, Firearms & Explosives using ATF Form 6NIA. The individual will also have to substantiate his or her eligibility to possess a firearm in the United States as a non-U.S. person (for example, by obtaining a hunting license from a U.S. state). The travelers must then declare their firearms at the border, provide CBP officials with any required documents, and maintain the required documents during the duration of their stay. Customs officials in the country of re-importation can use the ATF Form 6NIA to confirm that the individual is returning with the same firearms that were brought to the U.S.

We are unaware of any attempt on DDTC's part to enforce a requirement that foreign visitors (including from Canada) declare the "export" of firearms they temporary brought to the U.S. for lawful purposes through the AES when the visitor returns home. Indeed, it is difficult to understand how doing so would contribute to national security. Thanks the Second Amendment and America's unique commitment to individual liberty, the U.S. has by far the largest civilian stock of firearms in the world.²¹ Given the ready availability of firearms in the U.S. as compared to the rest of the world, there is little chance that America's interests are seriously threatened by foreign visitors bringing their own lawfully obtained guns into the country. At the very least, they are not threatened enough to impose a bureaucratic requirement for private foreign travelers that has already proven unworkable for their U.S. counterparts.

For these reasons, we urge BIS to omit from §§ 740.2 and 758. 10 the AES declaration requirement as applied to private foreign travelers temporarily bringing personal firearms into the U.S. Foreign hunters and competitive shooters help contribute to the U.S. economy, and these proposed changes would discourage them from doing so. Meanwhile, reports of foreign travelers committing crimes in the U.S. with firearms they lawfully brought with them are vanishingly rare.

II. The expanded data elements necessary for AES filings exacerbate the problems for private travelers forced to use the system and violate the spirit of Congressional prohibitions against federal firearm registries.

The proposal would "expand the data elements required as part of an AES filing for [firearms transferred from the USML] to include serial numbers, make, model and caliber," including for those wishing to use the BAG and TMP exemptions. This makes the previously mentioned problems with AES filing that much worse. It also runs counter to the spirit of clearly

²¹ Lederer, *supra* note 2.

established Congressional policy against using bureaucratic record-keeping requirements to establish firearms registries.

Firearm registries have long been anathema to gun owners as a tool that can be used to target them for discrimination and for the eventual seizure of their firearms. History is rife with examples of tyrants who used civilian disarmament to further their despotic ends,²² and America's own Revolutionary War began in earnest after a British raid on Colonial arms caches. Against this backdrop, federal gun control laws have consistently maintained a policy against national registries of the sorts of common arms with which Americans typically exercise their Second Amendment rights.²³

Congress, in enacting the Gun Control Act of 1968 (GCA), specifically declined to create a federal firearm registry, despite the urging of President Lyndon B. Johnson to do so.²⁴ Both the House and the Senate voted down proposals to require registration of guns as the legislation made its way through Congress.²⁵ As Sen. James McClure later stated,

The central compromise of the Gun Control Act of 1968—the sine qua non for the entry of the Federal Government into any form of firearms regulation was this: Records concerning gun ownership would be maintained by dealers, not by the Federal Government and not by State and local governments.^[26]

Congress then amended the GCA in 1986 to prohibit any rule or regulation enacted under its auspices from using the records that federal firearm licensees must keep to establish “any system of registration of firearms, firearms owners, or firearms transactions or dispositions ...”²⁷

When the Brady Handgun Violence Protection Act of 1993²⁸ created the authority for the National Instant Criminal Background Check System (NICS), Congress took pains to ensure the system would not circumvent the GCA's policy against firearm registration. The Act states that if the NICS determines receipt of a firearm would not be in violation of law, it shall “destroy all records of the system with respect to the call (other than the identifying number and the date the

²² See, e.g., STEPHEN HALBROOK, GUN CONTROL IN THE THIRD REICH, DISARMING THE JEWS AND “ENEMIES OF THE STATE” (Independent Inst. 2013).

²³ The National Firearms Act, 26 U.S.C. §§ 5801-5872, requires federal registration of limited categories of arms, but to the extent it covers firearms, those guns— which include machineguns, short-barreled shotguns, short-barreled rifles, and non-sporting firearms greater than .50 caliber – are comparatively rare among the U.S. civilian firearm stock.

²⁴ See Lyndon B. Johnson, “Remarks Upon Signing the Gun Control Act of 1968,” Oct. 22, 1968, available at <http://www.presidency.ucsb.edu/ws/?pid=29197> (last visited July 6, 2018).

²⁵ 114 Cong. Rec. H22267 (daily ed. July 19, 1968); 114 Cong. Rec. S27420-421 (daily ed. Sept. 18, 1968).

²⁶ 131 Cong. Rec. S9163-64 (July 9, 1985).

²⁷ 18 U.S.C. § 926(a).

²⁸ Pub. L. No. 103-159, 107 Stat. 1536 (1993).

number was assigned) and all records of the system relating to the person or the transfer.”²⁹ Section 103(i) of the Act contains additional prohibitions against the use of the system to create a federal firearms registry:

No department, agency, officer, or employee of the United States may—

(1) require that any record or portion thereof generated by the system established under this section may be recorded at or transferred to a facility owned, managed, or controlled by the United States or any State or political subdivision thereof; or

(2) use the system established under this section to establish any system for the registration of firearms, firearm owners, or firearm transactions or dispositions except with respect to person, prohibited by section 922 (g) or (n) of title 18, United States Code State law, from receiving a firearm.^[30]

Beginning in 1979, the annual appropriations bills that funded the ATF and its predecessor agency prohibited the Department of Justice from centralizing the records of federal firearm licensees (FFLs), until the prohibition was made permanent in 2011.³¹ Also made permanent in that 2011 appropriations bill was another rider that prohibited the ATF from compiling a searchable registry of gun buyers’ names from business records transferred to the agency by FFLs who ceased doing business.³² A third provision in the same bill permanently created a 24-hour deadline for the destruction of identifying information on those who successfully undergo a NICS check.³³

Even Obamacare contains a number of provisions that prohibit information collected under its authority from being used to create firearm registries.³⁴

Meanwhile, there is no express authority in the enabling act under which this rulemaking is promulgated for BIS to collect and retain detailed information on the firearms owned by law-abiding Americans. Yet BIS is proposing to compel Americans to enter identifying information about themselves and their firearms into a federal database as a precondition of engaging in lawful travel with firearms. Individuals forced to comply with this requirement are given no assurances about how the information will be retained or protected or whether it will be available to other entities, and if so, under what circumstances. This clearly runs contrary to the spirit of congressional policy governing the handling of firearm owner information.

²⁹ 18 U.S.C. 922(t)(2)(C).

³⁰ 107 Stat. at 1542.

³¹ Consolidated and Further Continuing Appropriations Act, 2012, Pub. L. No. 112-55, 125 Stat. 552, 609 (2011).

³² 125 Stat. 552, 610.

³³ *Id.* at 632.

³⁴ Patient Protection and Affordable Care Act, Pub. L. No. 111-148, 124 Stat. 119, 884-5 (2010).

The *de facto* federal firearm registry that would be created by forcing private gun owners to make detailed declarations about themselves and their firearms via the AES is another argument in favor of retaining the current procedure utilizing the paper Form 4457. That procedure vindicates the government's legitimate interest in monitoring the firearms that move and in out of the country but does not require the government to maintain a central registry of firearm owner information.

Going forward, any further attempt to automate the information private travelers must provide about their personal firearms should include express privacy provisions. At a minimum, these should prevent the dissemination or transfer of the information to other entities and require its complete destruction once CBP has verified that the firearms which were temporarily exported have been returned to the U.S.

For all these reasons, the NRA objects to the proposal's use of expanded data elements for private travelers seeking to utilize the BAG or TMP exceptions and urges that those requirements be omitted from the final rule.

III. The Final Rule Should Take Effect Immediately to the Extent Requirements Are Eliminated and Phase in Other Changes to Allow Regulated Entities Time to Adapt.

When the final rule governing Categories I, II, and III of the USML is published, certain changes should take effect immediately, while others should be phased in to allow regulated entities time to adapt.

Changes that merely eliminate requirements altogether should take effect immediately. For example, there is no justification for continuing to make "manufacturers" of articles that would be moved off the USML register with the Department of State.

On the other hand, where control of an item changes from the USML to the CCL, necessitating new procedures by the regulated entity, implementation of the final rule's effective date should be delayed to allow for new compliance systems to be established.

Licenses already granted under the ITAR should also be grandfathered for all outstanding transactions.

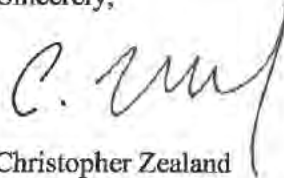
The NRA does not have any specific recommendations for a timeline of implementation for enforcing new requirements and procedures. We will defer to the entities whose day-to-day operations will be directly affected by the changes in the final rule.

Conclusion

The NRA is very pleased to see Export Reform finally turn its attention to Categories I, II, and III of the USML. The proposal charts a positive course that will contribute to national security, enhance the competitiveness of U.S. businesses, and benefit ordinary gun owners by mitigating the potential for export regulations to burden innocent conduct that does not implicate national security. We hope you will take the suggestions offered herein seriously to further promote the worthy goals of this effort, and we appreciate the opportunity to provide input.

We have also included our submission on the Directorate of Defense Trade Control's companion rulemaking and incorporate those comments herein by this reference.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Zealand", with a stylized flourish extending from the end.

Christopher Zealand
Senior Research Attorney
NRA-ILA

PUBLIC SUBMISSION

As of: 7/10/18 2:37 PM
Received: July 09, 2018
Status: Posted
Posted: July 10, 2018
Tracking No. 1k2-946k-ylsq
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0189

Public comment 110. Esterline. R. Baldwin. 7-9-18

Submitter Information

Name: Richard Baldwin

Address:

500 108th Ave NE

Suite 1500

Bellevue, WA, 98004

Email: rich.baldwin@esterline.com

Phone: 4255191874

Organization: Esterline Technologies Corp.

General Comment

See attached file(s)

Attachments

Esterline_Comment_DOC_RIN_0694-AF47



Esterline Corporation
500 108th Avenue NE
Suite 1500
Bellevue, WA 98004

Tel: 425-453-9400
Fax: 425-453-2916
www.esterline.com
NYSE symbol: ESL

July 9, 2018

Richard E. Ashooh
Assistant Secretary for Export Administration
Bureau of Industry and Security
U.S. Department of Commerce
14th and Pennsylvania Avenue NW
Room 2099B
Washington, D.C. 20230

ATTN: Request for Comments Regarding Reform of USML Categories I, II, and III,
Docket No. 111227796-5786-01, RIN 0694-AF47, 83 FR 24166

Dear Mr. Ashoosh:

Esterline Technologies Corporation supports the goals and objectives of the Export Control Reform (ECR) Initiative, and submits the following comments respecting the proposed transfer of items from Categories I, II, and III from the USML to the CCL, with focus on the appropriateness of the corresponding license requirements and licensing policies.

Summary of Comments and Recommendations

This section outlines our main comments, each of which is explained more fully in the remainder of this letter.

1. Keep the Commerce Control List free of AECA brokering.
2. Coordinate changes to USML Categories I, II, and III with changes to the United States Munitions Import List.
3. Address conflict with companion rule 83 FR 24198.

Comments and Recommendations

1. Keep CCL free of AECA brokering

One of the main advantages of ECR is that items on the CCL are not subject to the brokering requirements in section 38(a)(1) of the Arms Export Control Act (AECA) and 22 CFR 129. This advantage has been highlighted by the U.S. Government in public

remarks, such as Under Secretary Hirschorn's address to the BIS Update 2014 Conference.

Absence of brokering controls for CCL items has more significance than the absence of double licensing. Currently, items subject to the CCL do not require registration or licensing under 22 CFR 129, period. Once an item is determined to be on the CCL, it is clear that it is not subject to brokering, so there is no need to review the USMIL or the requirements in 22 CFR 129 before engaging in business. Knowledge that items on the CCL are not subject to brokering simplifies and streamlines transactions. Addition of brokering requirements for any item on the CCL would be an unwelcome development as it would introduce a significant complicating factor.

Esterline recommends BIS and DDTC reform USML Categories I, II, and III without introducing brokering controls to items in the CCL.

2. Coordinate changes to USML Categories I, II, and III with USMIL

The proposed rule would add the need to review the USMIL for activities that are not imports to the United States and involve items on the CCL. Classifying items against multiple control lists for a single transaction increases the cost and complexity of U.S. export controls.

Esterline recommends BIS and DDTC coordinate the change to USML Categories I, II, and III with the Bureau of Alcohol, Tobacco, Firearms, and Explosives so that a corresponding change is made to the USMIL at the same time. This would eliminate the need to consider both the USML and the USMIL when deciding whether a transaction involves brokering.

3. Address conflict with companion rule 83 FR 24198

The proposed rule is in conflict with the companion State Department proposed rule, 83 FR 24198, Public Notice 10094, RIN 1400-AE30. This leaves items transferred from the USML to the CCL potentially without a controlling ECCN.

Esterline recommends BIS coordinate with DDTC to resolve this conflict.

The BIS proposed rule states:

Category III of the USML, entitled "Ammunition/Ordinance," encompasses ammunition for a wide variety of firearms that may have military, law enforcement or civilian applications. Ammunition that has only or primarily military applications would remain on the USML as would parts, production equipment, "software" and "technology" therefor.

The State Department proposed rule states with respect to USML Category III:

Additionally, paragraph (c), which controls production equipment and tooling, will be removed and placed into reserve. The articles currently covered by this paragraph will be subject to the EAR.

In effect, the BIS proposed would receive specific production and test equipment for conventional ammunition into ECCN 0B505, while the State Department proposed rule would move all production and test equipment for ammunition and ordnance to the CCL, conventional or otherwise.

ECCN 0B505 would only control equipment specially designed for the production of ammunition and ordnance that is controlled in USML Category III if it falls within the list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment." This list is less than the scope of production equipment that will no longer be controlled in USML Category VIII(c) by the proposed companion rule, 83 FR 24198.

Similarly, ECCN 0E505 would not control technology for the technology for equipment specially designed for the production of ordnance, or technology for the software specially designed for such equipment.

A number of the articles proposed for USML Category III by 83 FR 24198 are not conventional ammunition, and their specially designed production equipment exceeds the specific list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment."

For example, production of combustible ordnance requires specialized production machines that do not fall within the list "tooling, templates, jigs, mandrels, molds, dies, fixtures, alignment mechanisms, and test equipment." Under the proposed rules, these specialized machines would fall outside both the USML and ECCN 0B505.

Summary

Thank you for the opportunity to comment on this proposed rule. Please feel free to contact me if you have any questions about the comments and recommendations provided.

Regards,



Richard R. Baldwin
Director, Trade Compliance Technology
Esterline Technologies Corporation

PUBLIC SUBMISSION

As of: 7/17/18 4:01 PM
Received: June 28, 2018
Status: Posted
Posted: July 10, 2018
Tracking No. 1k2-93zc-ex48
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0190

Public Comment 111. Individual. Chelsea Anonymous. 6-28-18

Submitter Information

Name: Chelsea Anonymous

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of Commerce. The proposed rule treats dangerous semiautomatic assault rifles as non-military devices. These rifles should certainly be treated as military devices. Assault rifles originated in World War II and have become standard weapons for armies throughout the world. To not classify these weapons as military devices is absurd. Additionally, the proposed rule eliminates Congressional oversight for gun export deals. Since these devices are proven to be dangerous, it is common sense that there should be Congressional oversight with gun exportations. In modern times, assault rifles have been the cause of violent and deadly crimes. As a result, there should be more congressional oversight and regulations, not fewer.

PUBLIC SUBMISSION

As of: 7/17/18 4:02 PM
Received: June 29, 2018
Status: Posted
Posted: July 10, 2018
Tracking No. 1k2-93zi-jwjd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0191

Public Comment 112. Individual. Sean Schroeder. 6-29-18

Submitter Information

Name: sean schroeder

Address:

PO Box 56

Westfield, WI, 53964

Email: seanjon46@yahoo.com

Phone: 6084036915

General Comment

I AGREE to this Proposed rule.
Thank you President Trump

PUBLIC SUBMISSION

As of: 7/17/18 4:25 PM
Received: June 29, 2018
Status: Posted
Posted: July 10, 2018
Tracking No. 1k2-93zp-d9mu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0192

Public Comment 113. Individual. Anonymous. 6-29-18

Submitter Information

Name: Anonymous Anonymous

General Comment

To all the Trump administration haters out there, I urge you to please check your history before you comment. The Obama administration initially proposed this reform initiative in 2009 and again in 2013. Both times it was withdrawn because of events unrelated to the proposed change. I support this change.

PUBLIC SUBMISSION

As of: 7/17/18 4:04 PM
Received: July 01, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9413-wf97
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0320

Public Comment 114. Individual. D. Hornsby. 7-1-18

Submitter Information

Name: Dean Hornsby

General Comment

Why do you people have the ludicrous perception that any legislation you pass is going to stop anyone from committing crimes?

Words on a piece of paper, which you refuse to read before voting on them, are as useless as the ink used to write them. As

quoted from John Dean "Jeff" Cooper "Killing is a matter of will, not weapons. You can't control the act itself by passing laws

about the means employed."

Jeff Cooper, 1958

PUBLIC SUBMISSION

As of: 7/11/18 10:28 AM
Received: July 06, 2018
Status: Posted
Posted: July 11, 2018
Tracking No. 1k2-944i-qsol
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0261

Public comment 115. SAAMI. R. Patterson. 7-6-18

Submitter Information

Name: Richard Patterson

Organization: Sporting Arms and Ammunition Manufacturers" Institute

General Comment

See attached file(s)

Attachments

BIS Letter Docket BIS-2017-0004 6 July 2018



SPORTING ARMS AND AMMUNITION MANUFACTURERS' INSTITUTE, INC.
SINCE 1926

July 6, 2018

By Internet: Federal eRulemaking Portal: www.regulations.gov - Docket BIS-2017-0004

By mail or delivery:

Steven Clagett
Office of Nonproliferation Controls and Treaty Compliance
Nuclear and Missile Technology Controls Division

Bureau of Industry and Security
U.S. Department of Commerce
14th Street and Pennsylvania Avenue, NW, Room 2099B
Washington, DC 20230

REFERENCE: Comments on Proposed Rule – Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) -- RIN 0694-AF47

Dear Mr. Clagett:

The Sporting Arms and Ammunition Manufacturers' Institute (SAAMI) respectfully submits the following comments to the above referenced Federal Register Notice 83 FR 24166, dated May 24, 2018. SAAMI is an association of the nation's leading manufacturers of firearms, ammunition and components. SAAMI was founded in 1926 at the request of the federal government and tasked with creating and publishing industry standards for safety, interchangeability, reliability and quality, coordinating technical data and promoting safe and responsible firearms use.

As the organization responsible for creating manufacturing standards for our industry, SAAMI is uniquely qualified to provide technical expertise particularly related to ammunition. We have reviewed the proposed rule, and agree in general with the transition of the majority of firearms and ammunition to the Commerce Control List. Export controls of commercial firearms and ammunition which are not inherently military, have no critical military or intelligence advantage, and have predominant commercial applications correctly belong under the Export Administration Regulations (EAR).

We would like to raise the following points regarding several items enumerated in the proposed rule:

Alignment of Terms Describing Caliber Between USML and CCL

In our review of both the DDTC and BIS proposed rules, we note an inconsistency in the way calibers are described in the control lists. In USML Categories I and II, firearms and guns are described “caliber .50 inclusive (12.7 mm)” and “greater than .50 caliber (12.7 mm)”, respectively. In new ECCN 0A501, firearms are described in subparagraphs .a and .b as “of caliber less than or equal to .50 inches (12.7 mm)” and “with a caliber greater than .50 inches (12.7 mm) but less than or equal to .72 inches (18.0 mm)”, respectively. The measurement in inches does not correlate exactly into caliber size, i.e. .50 caliber is not .50”. For example, .50 BMG caliber is actually 0.51” in diameter, not 0.50”. In commerce, .50 BMG ammunition is controlled with smaller calibers such as 300 Win Mag, and is separated from larger diameter calibers such as 600 Nitro Express. This could also impact other calibers such as 500 S&W Magnum or 50AE.

The caliber terms are not aligned between the control lists, and this could cause confusion and misinterpretation of the controls between the USML and CCL particularly in regard to the ammunition controls which follow the respective firearm controls.

The USML threshold of “.50 caliber” controls 50 BMG firearms in current Category I and related ammunition in current Category III. New ECCN 0A501 with the “.50 inches” threshold would put 50 BMG firearms under subparagraph b. However, 0A501.b does not control semi-automatic firearms “with a caliber greater than .50 inches (12.7 mm) but less than or equal to .72 inches (18.0 mm)”. Control of these semi-automatic firearms would be retained on the revised USML Category II. Because of the misaligned terms, controls on semi-automatic firearms currently designated USML Category I(a) would move to control under revised USML Category II. This is inconsistent with the transition of all other firearms currently controlled under USML Category I(a) to new ECCN 0A501.a.

In addition, revised USML Category III includes four subparagraphs which control related ammunition and components for “guns and armaments **controlled in Category II**”: subparagraphs (a)(9) ammunition, (d)(4) projectiles, (d)(7) cartridge cases, powder bags, or combustible cases, and (d)(14) target practice projectiles. Because 50 BMG, 50AE, and 500 S&W Magnum ammunition could be used in either semi-automatic or non-semi-automatic firearms, there is confusion on how these items will be controlled. If these calibers were classified under 0A501.a, then it would be clear that the related ammunition would be controlled under ECCN 0A505.

As currently written in the proposed rule, ECCN 0A505 controls ammunition for all firearms in 0A501. The proposed revised USML Category III includes control of ammunition for all guns and armament controlled in revised Category II. With the proposed description of caliber in inches in ECCN 0A501, ammunition for 50 BMG firearms would be controlled under both 0A505 and USML Category III. This needs clarification to rectify the overlapping controls.

RECOMMENDATION: For clarity of controls, there needs to be consistency in the expression of terms between the two control lists for items transitioning from one control list to the other. This can be accomplished in two ways. One would be for BIS to revise the terms in ECCN

0A501.a and .b to read “caliber” instead of “inches”. The other alternative would be for BIS and DDTC to describe caliber as .510 inches instead of .50 inches, and make the corresponding changes in USML Category II, and ECCN 0A505.

Deletion of ECCN 0A018.b and Revision of ECCN 0A505

In reviewing new ECCN 0A505 against other CCL entries, we note an inconsistency. Currently, ECCN 0A018 includes subparagraph .b, which controls the following:

“b. “Specially designed” components and parts for ammunition, except cartridge cases, powder bags, bullets, jackets, cores, shells, projectiles, boosters, fuses and components, primers, and other detonating devices and ammunition belting and linking machines (all of which are “subject to the ITAR.”);

Note: 0A018.b does not apply to “components” “specially designed” for blank or dummy ammunition as follows:

- a. Ammunition crimped without a projectile (blank star);
- b. Dummy ammunition with a pierced powder chamber;
- c. Other blank and dummy ammunition, not incorporating components designed for live ammunition”

The items listed in subparagraph .b have been revised and rewritten into the proposed changes to USML Category III and the new ECCN 0A505. Leaving ECCN 0A018.b unchanged will cause confusion due to the overlap of controlled items as listed in new ECCN 0A505.

In particular, we note that while 0A505.d indicates AT-only and UN controls for blank ammunition, the ECCN does not address controls for dummy ammunition which are the subject of the note to 0A018.b. Dummy ammunition is inert. It does not include powder or primer mix. It consists of only the metal components of the cartridge, with a hole drilled in the cartridge case to mark it as inert.

RECOMMENDATION: In keeping with the reorganization of firearm and ammunition ECCNs, we recommend BIS review 0A018.b against 0A505 and delete redundancies such as 0A018.b ““Specially designed” components and parts for ammunition” versus 0A505.x ““Parts” and “components” that are “specially designed” for a commodity subject to control in this ECCN...”.

We also request BIS revise 0A505 to include a Note similar to the Note to 0A018.b making a provision for dummy ammunition. Currently under 0A018.b, dummy ammunition is not controlled (EAR99) and we would request the same treatment under 0A505. If dummy ammunition can no longer be classified as EAR99 due to policy reasons, then at a minimum, we would request the same controls on dummy ammunition as for blank ammunition under 0A505.d, i.e. UN and AT-only controls.

Exception LVS Value Allowance

We note that proposed ECCN 0A505 includes an allowance for license exception LVS of \$100 for subparagraph .x “parts” and “components”. We also note that firearm parts and components under proposed ECCN 0A501 have an LVS allowance of \$500. Our members feel this is an inconsistency in the treatment of related items. In recent years, costs related to ammunition components have been increasing, with the largest increases affecting larger caliber cartridges. The proposed \$100 limit on LVS will be quickly met with small amounts of components, making this exception not as useful as intended. This will impact the smaller companies who will have increased license burden because the \$100 LVS limit will be too low to be of use.

RECOMMENDATION: We request BIS raise the value limit for the LVS exception to \$500 to match the allowance for firearm parts. We believe this is reasonable since the controls in place now under ECCN 0A018.b have an LVS allowance of \$3000 for “specially designed” components and parts for ammunition, and this allowance is much higher than the \$500 we are requesting. We also recommend BIS consider pegging the LVS value to inflation which would allow for incremental increases to match price increases over time.

We appreciate your consideration of our recommendations. Please let us know if you have questions or need any further information or clarification.

Thank you.



Richard Patterson
Executive Director

PUBLIC SUBMISSION

As of: 7/19/18 9:23 AM
Received: July 02, 2018
Status: Posted
Posted: July 11, 2018
Tracking No. 1k2-9420-uj2z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0319

Public Comment 116. Individual. Connie Stomper. 7-2-18

Submitter Information

Name: Connie Stomper

General Comment

See attached file(s)

Attachments

comments

I am a concerned citizen and I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.^[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault

rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]

The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce.[iv] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun

exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency – the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[v] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/12/18 8:59 AM
Received: July 01, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9416-p1c3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0321

Public Comment 117. Individual. M.M. 7-1-18

Submitter Information

Name: M M

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. I cannot support any action that will endanger the lives of American citizens overseas and this change will make it easier for terrorists and foreign entities to secure American-made firearms, including deadly assault weapons, for killing Americans living, working, or traveling abroad.

In my view, the proposed rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. If your agency approves this blatant corporate giveaway and vast disregard for national security, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board.

I am submitting this comment anonymously as the NRA and their syncophants use threatening language against anyone who questions their reasoning, data, or motivations. This is a matter of national security. Please wake up.

PUBLIC SUBMISSION

As of: 7/12/18 9:01 AM
Received: July 02, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-941p-4ehf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0323

Public Comment 118. Individual. S. Matlow 7-2-18

Submitter Information

Name: Sandra Matlow

Address:

Cincinnati, OH, 45211

Email: smatlow@peoplepc.com

Phone: 5136613615

General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode and these weapons are used by state and non-state groups in armed conflicts.

The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources or the interest to adequately enforce export controls.

PUBLIC SUBMISSION

As of: 7/12/18 9:06 AM Received: July 02, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-941h-4pnx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0324

Public Comment 119. Individual. Margaretq Sellers. 7-2-18

Submitter Information

Name: Margaretq Sellers

General Comment

I am opposed to the proposed rule change because I believe that it will put more guns in the hands of people who may use them against us.

PUBLIC SUBMISSION

As of: 7/12/18 9:08 AM
Received: July 02, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9420-aacx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0325

Public Comment 120. Anonymous. 7/2/18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am a teacher and US citizen with long-standing ties to Mexico and Mexicans. I completely oppose this proposed rule. The US government should not be taking orders from the NRA, which fears losing sales in the US because of right and righteous concerns over gun violence, and so wishes to export its means of profiting. This should not be US policy, human policy, or international relations. It is a transparent give-away to forces that will only further disrupt and derail Mexico's efforts to police its drug traffickers and curb its corruption.

Please reject this proposal.

PUBLIC SUBMISSION

As of: 7/12/18 9:11 AM
Received: July 02, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9421-x1wf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0326

Public Comment 121. Individual. Benita J. Campbell. 7-2-18

Submitter Information

Name: Benita J. Campbell

Address:

23 Hindman Avenue

Burgettstown, 15021-1165

Email: b_j_campbell@yahoo.com

Phone: 7249472790

General Comment

As a citizen of the United States, I have grave concerns about our violent gun culture that does so much harm to individuals, families, and society at large.

I oppose the proposed rule for the following reasons.

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15,

2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]

5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

PUBLIC SUBMISSION

As of: 7/12/18 9:12 AM
Received: July 02, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9422-9vs5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0328

Public Comment 122. Individual. Sarah Brown. 7-2-18

Submitter Information

Name: Sarah Brown

Address:

22 Main St.

Kittery, ME, 03904

Email: sarah@greenalliance.biz

Phone: 6038174694

Fax: 03904

General Comment

I hope you will oppose the Trump Administration's proposal to transfer licensing and oversight of firearms exports from the State Department to the Commerce Department. The proposal weakens controls over semiautomatic assault weapons, .50 sniper rifles, high-capacity ammunition magazines and it may deregulate 3D printing of guns. It could also weaken controls on gun imports.

The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups around the globe.

It's no surprise that the proposed rules are a priority for the National Rifle Association and the Newtown-based National Shooting Sports Foundation. Clearly, their goal is to open up international markets to compensate for lagging domestic sales. They are willing to spread our gun violence all over the world to boost gun industry profits.

PUBLIC SUBMISSION

As of: 7/12/18 9:13 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9425-oula
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0329

Public Comment 123. Individual. Jean Lindgren. 7-3-18

Submitter Information

Name: Jean Lindgren

Address:

389 Guerrero Street

San Francisco, CA, 94103

Email: lindgren.b8@gmail.com

Phone: 415-863-3341

General Comment

I'm a long time resident of San Francisco, California and am absolutely appalled by the hundreds...thousands...of people being killed by unstable humans...mainly white males...wielding automatic and semi-automatic weapons!!!! This MUST STOP! NO CIVILIAN NEEDS SUCH A WEAPON!!!!

Therefore, I strongly oppose the proposed rule for the following reasons:

1. It eliminates Congressional oversight for important gun export deals.
2. Transfers the cost of processing licenses from gun manufacturers to taxpayers. That's totally wrong and unfair.
3. Removes statutory license requirements for brokers thereby increasing the risk of trafficking.
4. Reduces or eliminates end-use controls, such as the State Depts Blue Lantern program...eliminating registration of firearms exporters has been a requirement since the 1940s for very good reasons!
5. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
6. Reduces transparency and reporting on gun exports.
7. Transfers gun export licensing from the agency with a mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
8. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence,

terrorism, and human rights violations. They should be subject to more controls, not less!

9. Ideally, automatic and semi-automatic weapons should be removed from the market entirely and not manufactured in the first place.

Thanks for your consideration.
Jean Lindgren
San Francisco, CA
Email: lindgren.b8@gmail.com

PUBLIC SUBMISSION

As of: 7/12/18 9:31 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942b-t11f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0333

Public Comment 124. Individual. Terrie Williams. 7-3-18

Submitter Information

Name: Terrie Williams

General Comment

When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce.[iv] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political

violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/12/18 9:33 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942g-pgfh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0335

Public Comment 125. Individual. Deirdre Dreslough. 7-3-18

Submitter Information

Name: Deirdre Dreslough

Address:

156 Waterfall Road

Ashford, 06278

Email: dee@dreslough.com

Phone: 8603411995

General Comment

Please leave the regulations as they stand. The more oversight for weapons sales and exports, the better. This is just a play for profits by a few organizations and companies and the USA, and the pain and inhumanity these weapons will bring to other nations will be a stain upon our national soul; all our souls. If anything, increase regulations on weapons exports, or eliminate them entirely. Please uphold the peaceful wishes of the majority of Americans.

"I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house."

PUBLIC SUBMISSION

As of: 7/12/18 9:35 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942g-agp9 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0336

Public Comment 126. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Don't export our firearms problems. Don't further line the pockets of the merchants of death.

PUBLIC SUBMISSION

As of: 7/12/18 9:36 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942h-1v4j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0337

Public Comment 127. Individual. Pamela Johnston. 7-3-18

Submitter Information

Name: Pamela Johnston

Address:

Otto, NC, 28763

Email: rinchen.johnston@gmail.com

Phone: 8285240076

Organization: i.am.not.a.company

General Comment

I wish to speak out against this proliferation of weapons used in war and crime, as follows:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

PUBLIC SUBMISSION

As of: 7/12/18 9:40 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942h-2tw1 Comments Due: July 09, 2018 Submission Type: API
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0338

Public Comment 128. American Entertainment Armories Association. Michael Faucette. 7-3-18

Submitter Information

Name: Michael Faucette

Address:

1350 I St. NW Suite 260
Washington, DC, 20005

Email: michael.faucette@mbassociateslaw.com

Phone: 2026260089

Organization: Mark Barnes & Associates on behalf of the American Entertainment Armories Association

General Comment

See attached file(s)

Attachments

ECR TMP Comment

AEAA Comment on Proposed Rule for “Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the USML”

RIN 0694-AF47

This law firm, Mark Barnes & Associates, submits this comment on behalf of our client, the American Entertainment Armories Association (“AEAA”). The AEAA is a trade group comprised of several companies and over 100 individual armorers who provide weapons in support of film and theatrical productions.¹

Unlike many other items that have transitioned from the USML to the CCL, firearms are subject to unique restrictions on the permanent import side under the jurisdiction of the ATF. The State Department’s jurisdiction over temporary exports and temporary imports has played an important role in the firearms industry by providing companies (movie armorers in particular) with a viable method of bringing their guns back into the U.S. without running afoul of ATF’s strict importation prohibitions under 18 U.S.C. § 922(l) and § 925(d)(3). While we support Export Control Reform’s transition of these items from the USML to the CCL, we also urge the Department of Commerce to maintain a temporary export and temporary import process that allows an alternative to ATF’s vigorous import restrictions.

We are concerned that BIS’s proposed rule does not provide a mechanism, such as a DSP-73, for certain firearms to be temporarily exported and subsequently returned to the United States, given the firearm importation prohibitions under 18 U.S.C. § 922(l) and § 925(d)(3).

Accordingly, for the reasons stated below, we respectfully request the following:

- TMP exemption be expanded beyond paragraphs (a)(5) and (a)(6) to also allow for use in film production;
- To remove the 75 firearm limit when in furtherance of a film production;
- **Most importantly, in situations where the TMP exemption is unavailable, we request that BIS consider a procedure or license, similar to a DSP-73, that will allow for the temporary export and re-importation of firearms. Without such a measure, movie armorers will be significantly restricted in their ability to temporarily export and import non-automatic and semiautomatic firearms for film use.**

CURRENT PRACTICE

Individual companies within the AEAA are regularly contracted by major film production companies to temporarily supply weapons needed for various film projects worldwide. All of these companies hold Federal Firearms Licenses, are registered with DDTC, and are subject to audit by the ATF. When a movie is filmed overseas that requires firearms and ammunition, these armorers are required to obtain DSP-73 temporary export licenses from DDTC. The practice has become so

¹ The question is often asked why movies need to use real firearms. The performance of the actors, especially method actors, are directly associated with having the feel, weight, recoil, muzzle flash, ejection, etc. of the real thing. Thus, actors will oftentimes prefer to handle the real thing. Aside from that, there is the visual of the gun itself and the flash it creates that give film makers their desired effect which cannot be duplicated otherwise.

routine that in 2013 DDTC published firearms guidelines which included requirements for the following documentation to be uploaded with all DSP-73 applications for overseas movie productions:

- Import permit issued by foreign government;
- Plot summary;
- A security plan that details who will maintain dominion and control of the firearms and the procedures in place to prevent diversion;
- Manifest;
- A statement that any unfired blank ammunition would be returned to the US; and

A DSP-73 license is vital because it covers both the US export and US import requirements. If the armorers were only able to obtain a DSP-5 permanent export license, the return of the exported firearms would be subject to ATF's permanent import process which restricts many types of firearms pursuant to federal law. For example, ATF policy is to deny the following three types of firearms pursuant to 18 U.S.C. § 925(d)(3):

1. Firearms not generally recognized as particularly suitable for or readily adaptable to sporting purposes ("non-sporting" firearms) – in a 1998 policy paper, ATF interpreted this to include any firearms that have certain cosmetic features;
2. Military surplus firearms; or
3. Firearms regulated under the National Firearms Act (machineguns, short barreled rifles, short barreled shotguns, destructive devices, and certain other weapons).

In order to comply with the above restrictions, ATF requires each firearm model be submitted for evaluation to determine if the above criteria is met. If ATF concludes that a particular firearm is not captured by one of the above three disqualifiers, the importer will be allowed to apply for a Form 6. Even if given the go ahead to apply, a Form 6 import permit application can take several months to process.

Clearly, the ATF Form 6 process is not intended to be used for firearms that leave the United States on a temporary basis. Moreover, most firearms temporarily exported for the movie industry are either military surplus, non-sporting, or National Firearms Act weapons, of which importation is prohibited.

The EAR's current regulation of shotguns under ECCN 0A984 has already presented the movie industry with significant problems when attempting to use the EAR's temporary export ("TMP") exemption. Because this ECCN 0A984 is subject to the Crime Control restrictions, there are very few countries where the TMP exemption can be used. *See* 15 C.F.R. § 740.2(a)(4). For example, there has recently been a large influx of movies being filmed on location in Colombia. Because TMP is unavailable for Crime Control countries such as Colombia, the armorer would need a BIS export license to export non-sporting shotguns. However, once the non-sporting shotguns were exported, § 925(d)(3) would prohibit their return to the United States. As such, shotguns are routinely removed from movie story lines because of the inability to return them to the United States without going through the burdensome ATF import process. In several instances, the production company has even contemplated having the armorers shorten the shotgun barrels to

below 18 inches, thereby placing them under ITAR jurisdiction so that they could be exported and returned all under one DSP-73. As explained below, the proposed rule only exacerbates this problem by offering TMP as the only temporary export/import mechanism.

PROPOSED RULES

As mentioned, when the TMP exemption is unavailable and a BIS license is required, it is impossible for movie armorers to return to the United States with the firearms they exported for film use. It is additionally not clear that movie production would even fit within one of the two approved uses of TMP in the proposed rules.

Approved TMP Uses

The proposed rules block the use of the TMP exemption for ECCN 0A501.a or .b firearms and shotguns with barrels under 18 inches in length (ECCN 0A502) under TMP *unless* such a transaction is in furtherance of

- “Exhibition and demonstration” under § 740.9(a)(5); or
- “Inspection, test, calibration, and repair” under § 740.9(a)(6).

The plain language of paragraphs (a)(5) and (a)(6) indicates that overseas movie production would not be a valid use of the TMP movie exemption. Paragraph (a)(5) envisions either display at a trade show or demonstration for a prospective buyer in anticipation of a sale. Furthermore, it requires “that the exporter, an employee of the exporter, or the exporter's designated sales representative retains ‘effective control’ over the commodities ... while they are abroad.” In many cases, foreign laws will not allow firearms to be under the “effective control” of private parties. As such, foreign governments will often mandate that their police or military maintain secure possession of the firearms while not on the film set, further preventing us from complying with paragraph (a)(5). Paragraph (a)(6) which allows “Commodities to be inspected, tested, calibrated, or repaired abroad” under the TMP exemption, is consonantly inapplicable to film production.

75 Gun Limit

We understand why TMP is limited to 75 firearms per shipment. However, this restriction further limits our ability to claim TMP as an exemption. Larger film productions such as war movies, will oftentimes require well beyond 75 firearms. Productions such as Warner Bros. / Dreamwork’s *Flags of Our Fathers* and *Letters from Iwo Jima* required US armorers to temporarily export over 700 non-automatic or semiautomatic firearms. Had BIS’s proposed rules been in place at that time, there would have been no way to export those vintage military surplus firearms and subsequently bring them back into the United States.

CONCLUSION

For the aforementioned reasons, we respectfully request that TMP be broadened for film use, and where TMP is not available, that a mechanism be available to return the firearms to the United States. Should you have any questions on this comment, please do not hesitate to contact Michael Faucette at (202) 626-0085 or michael.faucette@mbassociateslaw.com.

PUBLIC SUBMISSION

As of: 7/12/18 9:45 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942h-rmq2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0339

Public Comment 129. Individual. Sandra Spence. 7-3-18

Submitter Information

Name: Sandra Spence

Address: United States,

Email: sandyspence325@gmail.com

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department.

What I don't understand (but have figured out what I believe) is that the Administration has chosen to strengthen its already strong relationship with the NRA and its funders in the gun manufacturing industry to shore up that industry.

Meanwhile the Administration is treating people coming here to escape the escalating violence in their communities in Central America as if they were the criminals, going so far as to separate young children from their parents.

This proposed regulation would only result in even more violence and even more people trying to seek refuge in the U.S. from the violence our own policies would encourage.

This is immoral and should not be allowed.

This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless.

This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead

to a 20% increase in American gun exports. We see the gun lobby's influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters.

If you go forward with this disastrous policy, I will do everything in my power peacefully and democratically to hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

PUBLIC SUBMISSION

As of: 7/12/18 9:46 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942i-42hh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0340

Public Comment 130. Individual. Julie Graves. 7-3-18

Submitter Information

Name: Julie Graves

Address:

3133 Connecticut Avenue NW
#731
Washington, DC, 20008

Email: drjuliegraves@gmail.com

Phone: 5126898001

General Comment

This is to express my opposition to changes in regulation of firearms export. American weapons makers do not contribute positively to our economy. Their products lead to increased health care costs, job loss, loss of productivity, increased costs for care and housing of those with gunshot wound-induced disability, and harm to the environment. Spreading this harm to others in the world is irresponsible. Work instead to find other means for these weapons makers to manufacture items that contribute positively to the economy.

PUBLIC SUBMISSION

As of: 7/12/18 9:50 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942i-787t
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0342

Public Comment 131. Raytheon Company. Karri Allen. 7-3-18

Submitter Information

Name: Karri Allen

Address:

1100 Wilson Blvd
Suite 1600
Arlington, VA, 22209

Email: karri.n.allen@raytheon.com

Phone: 703-284-4303

Organization: Raytheon Company

General Comment

Please see attached.

Attachments

Raytheon Company Comments BIS Firearms and Ammo ECCNs (83 Fed Reg 24166) (filed 2018-07-03)

July 3, 2018

U.S. Department of Commerce
Bureau of Industry and Security
Regulatory Policy Division
Room 2009B, 14th Street NW
Washington, DC 20230
Via: www.regulations.gov

**Subject: Raytheon Company Comments on Firearms, Guns, Ammunitions, and
Related Articles**
Ref: 83 Fed. Reg. 24166 (May 24, 2018)
Docket ID: BIS-2017-0004

On May 24, 2018, the Department of Commerce, Bureau of Industry and Security (“BIS”) requested comments from the public on the proposed rule to transition certain items from United States Munitions List (“USML”) Categories I, II, and III to the Commerce Control List (“CCL”). Below please find comments from Raytheon.

License Exception TMP and New § 758.10

The temporary import and subsequent export exception and clearance rules proposed in 15 C.F.R. §§ 740.9 and 758.10 appear to seek to introduce mechanisms currently available to temporarily import certain items controlled on the USML after they transition to the CCL. Currently, permanent imports are regulated by the Attorney General under the direction of the Department of Justice's Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) whereas temporary imports are regulated by the Department of State, Directorate of Defense Trade Controls (“DDTC”). Under the International Traffic in Arms (“ITAR”), approval for temporary imports and subsequent exports is accomplished through a DSP-61 (temporary import license) or exemptions such as 22 C.F.R. §123.4. The ITAR draws a clear distinction between permanent and temporary import jurisdiction in 22 C.F.R. §120.18, although certain items regulated under the Gun Control Act or National Firearms Act, if authorized for import under those laws, continue to require transactional import approval from ATF for temporary imports unless ATF Ruling 2004-2 (April 7, 2004) permits the DSP-61 or ITAR exemption to substitute for this approval.

Existing mechanisms such as the DSP-61, the 22 C.F.R. §123.4 exemption, and the related ATF Ruling 2004-2 allow for temporary imports to be subsequently exported from the U.S. for a period of up to four years. It is unclear whether ATF Ruling 2004-2 will be amended to account for this USML to CCL transition but assuming it will be, as that would be necessary to keep industry in the same position as currently, the method proposed in the BIS proposed rule would permit temporary import and subsequent export within a period of only one year compared to four years under the current setup. We recommend that the period in 15 C.F.R. § 740.9(b)(5) be extended to four years as certain activities for which a temporary import is

Raytheon Company Comments – Firearms, Guns, and Ammunition
July 3, 2018
Page 2 of 2

required cannot always be accomplished within one year and a four year period is necessary to keep industry in the same position as it currently is.

Additionally, under DDTC's current practice, if a temporary import originally intended to be exported within four years later needs to stay in the U.S. for a period of longer than four years, industry can request a replacement DSP-61 or General Correspondence from DDTC to extend the period of time. It is unclear what mechanism BIS would use to administer similar requests so we request clarification on this issue. If the TMP exception temporary import time period remains at one year, the need for this mechanism will be increasingly important.

Finally, the proposed additions to 15 C.F.R. § 740.9 include an instruction directing temporary importers and exporters to contact CBP at the port of temporary import or export, or at the CBP website, for the proper procedures to provide any data or documentation required by BIS. Raytheon recommends that BIS and CBP coordinate to create standardized instructions for all ports that can be made available online so that each shipment does not have to be specially coordinated.

Effective Date

Raytheon strongly supports using a delayed effective date of 180 days as has been done for other USML to CCL transitions. Such transitions require updates to IT systems, policies, processes, and training which require time to complete. Based on experiences in performing these tasks during previous transitions, the full 180 days is necessary.

We appreciate the ability to comment and thank you for your partnership.

* * *

PUBLIC SUBMISSION

As of: 7/12/18 9:52 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942j-lxpr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0344

Public Comment 132. Individual. Adele Riffe. 7-3-18

Submitter Information

Name: Adele Riffe

General Comment

The Trump administration has proposed to make it easier for U.S. gun makers to export guns and ammunition globally, even though U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in Latin America, the Middle East, Africa and around the world.

The proposal would move export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department, removing Congressional oversight, weakening controls on who ends up with the weapons and even lifting restrictions on 3D printing of guns that would permit production of guns both overseas and here at home. The U.S. gun industry and the NRA have pushed hard for these changes to make up for falling gun sales. The Commerce Department estimates that the proposed change would apply to 10,000 gun export applicants a year.

Please do not allow any weakening of controls or restrictions on gun and ammunitions licensing, sales and/or production - either nationally or abroad. We need common-sense restrictions on guns. The NRA just wants to sell more guns, to improve its profits. It does not care that its actions have direct consequences on our lives, increasing the probability that someone we love might be involved in gun-related violence.

PUBLIC SUBMISSION

As of: 7/12/18 10:45 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942k-efz8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0352

Public Comment 133. Individual. Marie Lucey. 7-3-18

Submitter Information

Name: Marie Lucey

Address:

5018 36th Avenue
Hyattsville, 20782

Email: lucey@franciscanaction.org

Phone: 202-527-7562

General Comment

My name is Sister Marie Lucey, and I am a Catholic Franciscan Sister serving as Associate Director of Franciscan Action Network (FAN) in Washington, DC. FAN is a member of Faiths United to Prevent Gun Violence, and works to reduce gun violence in our country at national, state and local levels. We regret that firearms are a major export of the United States and believe that gun export regulation is important. We oppose the proposed rule change for many reasons including the following:

Departments of State and Commerce have different missions, purposes, and roles and gun export licensing should not be transferred from an agency with a mission to promote stability, conflict reduction and human rights to an agency whose mission is to promote trade.

The proposed rule would eliminate Congressional oversight for significant gun export deals, and its ability to comment on related human rights concerns would be limited. In a September, 2017 letter, Senators Cardin (senator in my state of residence), Feinstein and Leahy noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of condoning and enabling 3D printing of firearms in the U.S. and elsewhere.

Firearms are used around the world to kill a thousand people every day in acts of organized crime, political

violence, terrorism, and human rights violations. Military-style assault rifles and ammunition transferred to Commerce control are weapons of choice for criminal organizations in Mexico and Latin American countries, especially the Northern Triangle, that are responsible for record levels of homicides. The export of such weapons need more, not fewer, controls

PUBLIC SUBMISSION

As of: 7/12/18 10:48 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942k-t0gk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0353

Public Comment 134. Individual. Susan Hornik. 7-3-18

Submitter Information

Name: Susan Hornik

General Comment

I am extremely concerned with gun violence against civilians both within the US and around the world, and I strongly oppose moving export licenses of assault weapons and other powerful firearms from the State Department to the Commerce Department. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts so this is a fiction. Additionally, many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

In fact, the proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

Additionally, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Hence, there is reason for considerable concern that firearms brokers will no longer be subject to US brokering law. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons now. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.

Finally, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Why should citizens pay for gun exporters to profit? Its another absurd example of corporate welfare.

PUBLIC SUBMISSION

As of: 7/12/18 10:49 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942k-iug8 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0354

Public Comment 135. Individual. Fred Sigworth. 7-3-18

Submitter Information

Name: Fred Sigworth

Address:

138 Vineyard Rd
Hamden, 06517

Email: fsigworth@gmail.com

Phone: 203 314 2144

General Comment

Please do not relax rules for export of firearms.

PUBLIC SUBMISSION

As of: 7/12/18 10:53 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942k-o317
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0356

Public Comment 136. Individual. Kenneth Foscue. 7-3-18

Submitter Information

Name: Kenneth Foscue

Address:

195 Wayland St
NORTH HAVEN, CT, 06473

Email: kfosc@snet.net

Phone: 2032302488

Organization: CT Department of Public Health

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

As a resident of Connecticut, I have seen the horror of gun violence at its worst at the Sandy Hook elementary school in 2014!

PUBLIC SUBMISSION

As of: 7/12/18 10:55 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942k-b5am
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0357

Public Comment 137. Individual. William Steinmayer. 7-3-18

Submitter Information

Name: William Steinmayer

Address:

37 Hewitt Rd.

Mystic, CT, 06355

Email: wsteinmayer@aol.com

Phone: 860 572 0091

General Comment

I strongly oppose the decision to move oversight on the sale of assault weapons from the State Department to the Department of Commerce. These weapons should be classified as strictly for military use, which this rule violates.

PUBLIC SUBMISSION

As of: 7/12/18 10:56 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942k-r621
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0358

Public Comment 138. Individual. Peter Gottschalk. 7-3-18

Submitter Information

Name: Peter Gottschalk

Address:

6 Browns Lane
Old Lyme, CT,

General Comment

To Whom It May Concern:

The loosening of firearm export rules fuels violence around the globe. There are two compelling reasons to not do so.

1. The basic moral wrong perpetuated by providing more lethal weapons used in ways that kill civilians and destabilize societies.
2. While most Americans may not appreciate the havoc wrought by our weapon exports, people across the globe recognize the weapons used to harm their families and friends, and damage their societies and economies. Many people understand who are the manufacturers of specific armaments and associate the nations from which they originate with the violence they perpetuate. This is a grassroots foreign policy disaster for the United States.

Please maintain if not strengthen the rules already in place.

Thank you for your consideration.

PUBLIC SUBMISSION

As of: 7/12/18 10:57 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942k-6763 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0359

Public Comment 139. Anonymous. 7-3-18

Submitter Information

Name: anonymous Anonymous

General Comment

Exporting firearms that will likely be used to kill non-military citizens is not helpful to longevity for peace-loving individuals. Please do not allow this BIS rule to pass.

My study of preventive medicine is not in synch with this rule.

PUBLIC SUBMISSION

As of: 7/12/18 10:58 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942k-8kpr Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0360

Public Comment 140. Individual. Peter Hanson. 7-3-18

Submitter Information

Name: Peter Hanson

Address:

81 Marvin Ridge Road
New Canaan, CT, 06840

Email: peterh9@optonline.net

General Comment

Please keep gun exports accountable and having oversight. Let's not export murder.

PUBLIC SUBMISSION

As of: 7/12/18 10:59 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942k-fgqx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0361

Public Comment 141. Individual. Jeremy Stein. 7-3-18

Submitter Information

Name: Jeremy Stein

General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war. Guns do no make us safer. Exporting more guns outside of the US would only make the rest of the world suffer the same amount of gun violence that is plaguing the US.

PUBLIC SUBMISSION

As of: 7/12/18 11:02 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9421-2711
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0362

Public Comment 142. Individual. Leslie Bhutan. 7-3-18

Submitter Information

Name: Leslie Bhutan

General Comment

I oppose any loosening of laws that result in increased sales and exports of guns from the US. It is awful enough that our country has almost the highest rate of gun deaths per capita in the world. We should increase restrictions on ALL gun purchases by everyone everywhere, not increase them!

PUBLIC SUBMISSION

As of: 7/12/18 11:03 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9421-ex0b
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0363

Public Comment 143. Individual. Art Hunt. 7-3-18

Submitter Information

Name: Art Hunt

Address:

86 Edgemere Road
Hamden, 06517

Email: art@cheswood.com

Phone: 2032883530

General Comment

I am opposed to moving export license oversight for firearms from the Department of State to the Department of Commerce. The export of firearms is a state department responsible not a commerce department responsibility. The proposed rule change treats semiautomatic assault rifles as non-military when they have significant military uses especially by non-state actors.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

keep the oversight within the Department of State.

Thank you for considering my comments.

PUBLIC SUBMISSION

As of: 7/12/18 11:04 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-9421-1dg9 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0364

Public Comment 144. Individual. Jason Miller. 7-3-18

Submitter Information

Name: Jason Miller

Address:

801 North Monroe
Apt. 213
Arlington, VA, 22201

Email: jason@franciscanaction.org

Phone: 703-888-2570

General Comment

My name is Jason Miller and I am the Director of Campaigns and Development at the Franciscan Action Network in Washington, D.C. As a person of faith, I am extremely disturbed that guns are a major export of the United States and believe that gun export regulation is important. I oppose the proposed rule change because as Pope Francis said: there is a piecemeal world war III currently being waged and the United States is one of the biggest players. Instead we must work for diplomacy and peace.

PUBLIC SUBMISSION

As of: 7/12/18 11:05 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9421-8j1j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0365

Public Comment 145. Individual. patti keegan. 7-3-18

Submitter Information

Name: patti keegan

General Comment

How many people must die in the cause of the NRA and the gun manufacturer. And now we will allow them to sell their guns to other countries. What so they can ban together and come back to the U.S. and kill more Americans. Do we not have some moral responsibility to the people of the world as well as our own?

PUBLIC SUBMISSION

As of: 7/12/18 11:06 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-9421-jd9w Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0366

Public Comment 146. Individual. Erin Freed. 7-3-18

Submitter Information

Name: Erin Freed

Address:

209 Laurel Street

Longmeadow, MA, 01106

Email: ebfreed15@gmail.com

Phone: 4135755869

Fax: 01106

General Comment

I am writing to oppose changing the rules so as to make it easier for U.S. firearm manufacturers to export assault rifles and other guns. We need the valuable oversight and accountability that is provided by the current law.

With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 11:07 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942l-uyqp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0367

Public Comment 147. Individual. Scott Schweizer. 7-3-18

Submitter Information

Name: Scott Schweizer

Address:

Norwalk, CT, 06851

Email: scotts2@optonline.net

General Comment

As a veteran of the Persian Gulf War I oppose the gun industrys agenda of loosening rules, regulations and export controls. Stand up to the gun lobby now.

PUBLIC SUBMISSION

As of: 7/12/18 11:08 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-9421-7acc Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0368

Public Comment 148. Individual. Henry Lowendorf. 7-3-18

Submitter Information

Name: Henry Lowendorf

Address:

42 Young St.

New Haven, 06511

Email: grnhpeacecouncil@gmail.com

Phone: 2033899547

General Comment

Our guns kill children everywhere. The government of the U.S.A. should not be supporting businesses that provide the means for killing children at home and abroad. The merchants of death do not care how their products are used as long as they profit. But the people of this country and our government ought not to be promoting the movement of arms around the world.

PUBLIC SUBMISSION

As of: 7/12/18 11:09 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942m-sjou Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0369

Public Comment 149. Individual. Margaret Brown. 7-3-18

Submitter Information

Name: Margaret Brown

General Comment

I am strongly OPPOSED to relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. Gun violence is a major killer, taking the lives of 1,000 people around the world every day! We should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: 7/12/18 11:10 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942m-t97g
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0370

Public Comment 150. Individual. Cindy Ware. 7-3-18

Submitter Information

Name: Cindy Ware

Address:

1208 Skycrest Drive #1

Walnut Creek, CA, 94595

Email: cindyware@mac.com

Phone: 9259561743

General Comment

I strongly urge our United States Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability.

Gun violence is a real and ever-increasing threat both here and abroad. I do not want our government to make it easier for American guns to cause tragedies either here or abroad.

We all should be making it HARDER, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: 7/12/18 11:11 AM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942m-nwlq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0371

Public Comment 151. Individual. Star Star. 7-3-18

Submitter Information

Name: Star Star

Address:

Somersworth, NH, 038782727

Email: grammystar@gmail.com

General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Submit comments now to the State Department and the Commerce Department opposing the rule change.

*You can copy and paste the points in this email or use your own voice to make unique comments to the State and Commerce Departments.

U.S. Department of State: <https://action.momsrising.org/go/38289?t=10&akid=11002%2E2254141%2Ezo8aRS>

WASHSTATEB005314

U.S. Department of Commerce: <https://action.momsrising.org/go/38290?t=12&akid=11002%2E2254141%2Ezo8aRS>

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/12/18 11:13 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942m-2rab Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0372

Public Comment 152. Individual. Peter Davison. 7-3-18

Submitter Information

Name: Peter Davison

Address:

Idyllwild, CA, 92549

Email: DAVISON@PETERDAVISON.COM

General Comment

Stop with the guns already, many civilized nations have and people live without the fear that they are going to be shot any minute. I know guns make a lot of money, but maybe there are better ways to make money.

PUBLIC SUBMISSION

As of: 7/12/18 11:15 AM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942m-94f3 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0373

Public Comment 153. Individual. Jean G. Cochran. 7-3-18

Submitter Information

Name: Jean G. Cochran

Address:

900 E. Harrison Ave.

A-15

Pomona, CA, 91767-2075

Email: cochrancosmocat@verizon.net

Phone: 9096247645

General Comment

I oppose the sale of military firearms to other countries. This would simply escalate already dangerous conflicts and harm innocent civilians.

PUBLIC SUBMISSION

As of: 7/12/18 12:40 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942n-fqpu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0379

Public Comment 154. Individual. TAINA LITWAK. 7-3-18

Submitter Information

Name: TAINA LITWAK

General Comment

Please do not approve this rule. ALL our arms exports need to be monitored and need to be kept on the USML

The NRA and gun manufacturers are pushing hard for this rule change. The President will go along with whatever they tell him is "good for American Business" They want guns everywhere, for everyone, not just here in the United States, but around the world.

I like many citizens believe that the result of this new rule means that it will become easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain large caches of American guns and ammunition. Firearms exports SHOULD CONTINUE TO BE classified as military so they are under the regulation of the State Department. As it stands, Congress can block sales of large batches of firearms to foreign countries and this is an important thing for the security of this country. I would not trust this President to make a good decision on this. He is too bought and paid for by the NRA and the arms manufacturers.

PUBLIC SUBMISSION

As of: 7/12/18 12:41 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942n-rddt Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0380

Public Comment 155. Individual. Darwin Busa. 7-3-18

Submitter Information

Name: Darwin Busa

Address:

6705 S INDIAN RIVER DR
FORT PIERCE, FL, 34982-7710

Email: darbusa@gmail.com

Phone: 7723186666

Fax: 34982-7710

General Comment

It makes no sense for Commerce to assume regulation of military useful weapons from State Dept. Commerce has neither the staff nor the expertise to handle this important duty. I am totally opposed to this industry sponsored proposal.

PUBLIC SUBMISSION

As of: 7/12/18 12:42 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942n-x4ci
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0381

Public Comment 156. Individual. CJ Horner. 7-3-18

Submitter Information

Name: CJ Horner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

WHAT THE HECK IS HAPPENING TO THIS COUNTRY????!????!!!!?????????

Please, in the name of all that's holy, DO NOT DESTROY the carefully constructed structure that has been put in place to create protection for not only citizens of the USA, but for the world at large.

I beg this of you. I feel hope starting to die in me. Please re-instill my ability to hope for a better America and a better world.

PUBLIC SUBMISSION

As of: 7/12/18 12:43 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942n-v2ly
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0382

Public Comment 157. Individual. Jonathan Holland. 7-3-18

Submitter Information

Name: Jonathan Holland

General Comment

I believe this change is a poor move for America and I oppose it. Thank you for your consideration.

PUBLIC SUBMISSION

As of: 7/12/18 12:44 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942n-gz2p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0383

Public Comment 158. Individual. Stuart Rubinow. 7-3-18

Submitter Information

Name: Stuart Rubinow

General Comment

I oppose the proposed rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. But these two departments have very different mandates: State to safeguard our nation, and Commerce to promote American businesses. Assault weapons should not be seen as just another product to be promoted, bought, and sold like washing machines or any other consumer product. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/12/18 12:45 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942o-bk8z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0384

Public Comment 159. Individual. Marguerite Ritchie. 7-3-18

Submitter Information

Name: Marguerite Ritchie

General Comment

I oppose the change in rules in the regulation of exportng firearms from the U.S. State Dept. to the Dept. of Commerce. This would not allow Congress to be notified and block any shipment of large caches of firearms to be exported to foreign countries thus enabling dangerous entities such as terrorist groups, oranized crime and traffickers to prevail and is matter of national security.

The U.S. Dept. Of Commerce is ill equipped as it lacks the resources and field offices to take on such an endeavor of regulating large export of firearms from so many possible locations.

I feel it would be a mistake to change the current rules and accountability.

PUBLIC SUBMISSION

As of: 7/12/18 12:47 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942o-to41
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0385

Public Comment 160. Individual. Christine Armstrong. 7-3-18

Submitter Information

Name: Christine Armstrong

Address:

9 Gunn Hill Road

New Preston, 06777

Email: charms345@mac.com

General Comment

I am an American who travels to Mexico often. It is extremely difficult there for citizens to legally buy guns. They do not have mass shootings there, but there is a horrendous amount of violence perpetrated in Mexico by criminals who obtain American-made guns. This makes maintaining order extremely difficult for that countrys law enforcement - a problem which has direct ramifications on the US. Do not make it easier for American gun manufacturers to profit off of violence around the world and here in our beautiful U.S. of A.

PUBLIC SUBMISSION

As of: 7/12/18 12:48 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-mdft
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0386

Public Comment 161. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule; it will make the nation less safe.

PUBLIC SUBMISSION

As of: 7/12/18 12:49 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-10qp Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0387

Public Comment 162. Individual. Ted Neumann. 7-3-18

Submitter Information

Name: Ted Neumann

Address:

114 Lark St

Altamont, NY, 12009

Email: wineshopted@yahoo.com

Phone: 5188617148

General Comment

We must pass laws that at least make an attempt to stem the heinous gun violence that is happening in our land.

PUBLIC SUBMISSION

As of: 7/12/18 12:58 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-sp4h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0388

Public Comment 163. Individual. Linda Bronstein. 7-3-18

Submitter Information

Name: Linda Bronstein

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S.

Commerce Department. The rule change would facilitate firearms exports to oppressive regimes, remove safeguards that help

keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries

and causes mass migration. Firearms are used to kill people every day around the world in acts of organized crime,

political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/12/18 12:59 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-y9u5 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0389

Public Comment 164. Individual. Steve Graff. 7-3-18

Submitter Information

Name: Steve Graff

Address:

1948 Malcolm Ave

Los Angeles, CA, 90025

Email: stevegraff12@hotmail.com

Phone: 111111111

General Comment

This control is still warranted. This is a gave away for weapon manufacturers.

PUBLIC SUBMISSION

As of: 7/12/18 1:00 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-v8di
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0390

Public Comment 165. Individual. Steve Hoelke. 7-3-18

Submitter Information

Name: Steve Hoelke

General Comment

This is a BAD idea!

PUBLIC SUBMISSION

As of: 7/12/18 1:01 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-oom4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0391

Public Comment 166. Individual. Joan Balfour. 7-3-18

Submitter Information

Name: Joan Balfour

General Comment

A rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business) would open new floodgates for arms sales internationally, with serious implications for our national security.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/12/18 1:02 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-2ntt
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0392

Public Comment 167. Individual. Kyrie Collins. 7-3-18

Submitter Information

Name: Kyrie Collins

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It can not be permitted!

PUBLIC SUBMISSION

As of: 7/12/18 1:03 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-cwqd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0393

Public Comment 168. Individual. Scott Coahran. 7-3-18

Submitter Information

Name: Scott Coahran

General Comment

With the unending series of wanton, violent acts that are committed, it seems, on at least a monthly basis, the last thing we need is something that will expedite the purchase and ownership of guns for the sake of commercial profit

PUBLIC SUBMISSION

As of: 7/12/18 1:04 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-b4rz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0394

Public Comment 169. Individual. David Morris. 7-3-18

Submitter Information

Name: David Morris

Address:

385 61st Street

Oakland, CA, 94618

Email: mahlsdorf@earthlink.net

Phone: 5106583382

General Comment

Changing firearms regulation and classification as proposed in this rule would be the height of madness. It is a blatant attempt by the NRA and gun manufacturers to pull a runaround maneuver. Under no circumstances should firearms be reclassified: Their sale and export should remain the purvey of the US Government and Congress. Doing anything else would open a floodgate of arms shipments to all kinds of dangerous forces outside the US. Please, please do not consider even the possibility of changing the current ruling.

PUBLIC SUBMISSION

As of: 7/12/18 1:05 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-bpww Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0395

Public Comment 170. Individual. Marci Diamond. 7-3-18

Submitter Information

Name: Marci Diamond

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Control of the export of firearms that could fall into the hands of those who would harm Americans is a national security issue.

PUBLIC SUBMISSION

As of: 7/12/18 1:10 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-gmxl Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0396

Public Comment 171. Individual. Barb Crumpacker. 7-3-18

Submitter Information

Name: Barb Crumpacker

Address:

1015 East Lakeside Avenue

Coeur d'Alene, 83814

Email: crummy1810@frontier.com

Phone: 2086643466

Fax: 83814

General Comment

Gun limits provide increased safety & peace of mind for the citizens of the world.

PUBLIC SUBMISSION

As of: 7/12/18 1:11 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-n28f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0397

Public Comment 172. Individual. Ann Rushton. 7-3-1

Submitter Information

Name: Ann Rushton

Address:

4159 Stansbury Ave.
Sherman Oaks, 91423

Email: annrushton@hotmail.com

Phone: 8187891395

Fax: 91423

General Comment

Permits for sales of arms overseas should be based on sound American policy putting safety of Americans and American interests first and above all. A permitting process based on what is most profitable to gun manufacturers must be firmly rejected. They are responsible for too many deaths already. We should not be arming those around the world who will do even more harm.

A transfer of this process from the Dept of State to the Dept of Commerce for the financial benefit of manufacturers of weapons is completely contrary to legitimate American policy and interests.

PUBLIC SUBMISSION

As of: 7/12/18 1:12 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-nhvs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0398

Public Comment 173. Individual. Edith Simpson. 7-3-18

Submitter Information

Name: Edith Simpson

General Comment

I am against moving regulation of exports of firearms from the State Department to the Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/12/18 1:12 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-kswH
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0399

Public Comment 174. Individual. Cheryl Herrick. 7-3-18

Submitter Information

Name: Cheryl Herrick

Address:

28 East Village Dr.
Burlington, 05401

Email: herrickvt@gmail.com

Phone: 8025570228

Fax: 05401

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The US should be finding ways to be a better neighbor and citizen in the world, not merely export violence in pursuit of profits.

PUBLIC SUBMISSION

As of: 7/12/18 1:13 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-6a2t Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0400

Public Comment 175. Individual. Marjean Doden. 7-3-18

Submitter Information

Name: Marjean Doden

Address:

4100 N.Neenah Ave

Chicago, IL, 60634

Email: mdoden@rocketmail.com

Phone: 7086517318

General Comment

We have no business encouraging the sale of these weapons!!! The violence in our country does not need to be spread to the rest of the world!!!

PUBLIC SUBMISSION

As of: 7/12/18 1:14 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-fl7a Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0401

Public Comment 176. Individual. Richard Sparkes. 7-3-18

Submitter Information

Name: Richard Sparkes

Address:

3332 Pine Villa Ct
Grand Blanc, MI, 48439

Email: r.sparkes@att.net

Phone: 810-606-1571

General Comment

I completely oppose any rule changes that would transfer the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. American firearm manufacturers cause enough bloodshed and violence here at home. There is no reason this mayhem should be easier to export to peaceful, civilized and non-violent nations. Thank you very much.

PUBLIC SUBMISSION

As of: 7/12/18 1:15 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-zana
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0402

Public Comment 177. Individual. Susan Heath. 7-3-18

Submitter Information

Name: Susan Heath

General Comment

I oppose the rule change that would switch the regulating of firearms exports from the State Department to the Commerce Department. The State Department is much better suited for this matter and has been doing so for years. The world is dangerous enough without making this switch.

PUBLIC SUBMISSION

As of: 7/12/18 1:16 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-9giw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0403

Public Comment 178. Individual. Michael Kemper. 7-3-18

Submitter Information

Name: Michael Kemper

Address:

1388 California Street

San Francisco, 94109

Email: mckemper84@gmail.com

Phone: 4157765657

General Comment

The Unites States has a gun problem. Anyone who doesn't think so has been in a dark room for most of her life. The United States has the highest percent of gun ownership, the highest number of guns, extremely high rates of murder and gun related crime compared with most of the world. The United States government must take measures to address this problem. Making it easier to obtain a gun is not an answer, it is an abdication of responsibility to its citizens.

PUBLIC SUBMISSION

As of: 7/12/18 1:17 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-6dpk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0404

Public Comment 179. Individual. Laurie Gates. 7-3-18

Submitter Information

Name: Laurie Gates

General Comment

I oppose switching the regulation of firearms from the State Department to the Commerce Department. This action would make it easier for organized crime and terrorist organizations to purchase weapons and further fuel violence in oppressive regimes.

PUBLIC SUBMISSION

As of: 7/12/18 1:18 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-6jd1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0405

Public Comment 180. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Seeing as terrorist groups and other organizations accused of serious human rights violations have been able to make excellent use of non-automatic and semi-automatic low-caliber weapons, those sorts of firearms should remain on the USML. I strongly oppose the proposed rule change

PUBLIC SUBMISSION

As of: 7/12/18 1:19 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-n7a8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0406

Public Comment 181. Individual. Toniann Reading. 7-3-18

Submitter Information

Name: Toniann Reading

Address: 98294-0372

Email: toni.reading@gmail.com

Phone: 2222222222

General Comment

I adamantly oppose this proposed rule change!

PUBLIC SUBMISSION

As of: 7/12/18 1:20 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-dw2f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0407

Public Comment 182. Individual. Tisa Anders. 7-3-18

Submitter Information

Name: Tisa Anders

Address:

12187 W Mexico Place
Lakewood, CO, 80228

Email: tianders2003@yahoo.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need the State Department to continue with safety on this matter, not profits. In other words, let's continue to value and cherish people.

PUBLIC SUBMISSION

As of: 7/12/18 1:21 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-wdn5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0408

Public Comment 183. Individual. Linda Garcia. 7-3-18

Submitter Information

Name: Linda Garcia

General Comment

I oppose this proposed change of rules switching the authority from the State Department to the Commerce Department for the regulating of the export of guns sells and Licensing. This appears to be a dangerous proposal as there would likely be limited oversight in the Commerce Department as opposed to the State Department. I have not seen any rationale for this dangerous proposal.

PUBLIC SUBMISSION

As of: 7/12/18 1:22 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-cg6s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0409

Public Comment 184. Individual. Jun Whang. 7-3-18

Submitter Information

Name: Jun Whang

General Comment

We strongly oppose this change since it creates a serious risk to our national security by facilitating the export and sale of dangerous firearms to foreign agents.

PUBLIC SUBMISSION

As of: 7/12/18 1:23 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-38th
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0410

Public Comment 185. Individual. Barbara Van Walsen. 7-3-18

Submitter Information

Name: Barbara Van Walsen

General Comment

With our issues with gun control, we should not allow foreign countries to receive any firearms, guns, and ammunition. I don't want a foreign country to use American military weapons to conduct a war with us.

PUBLIC SUBMISSION

As of: 7/12/18 1:29 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-uv2b
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0411

Public Comment 186. Individual. Charles Wright. 7-3-18

Submitter Information

Name: Charles Wright

Address:

330 Chidester St

Apt 203

Ypsilanti, MI, 48197

Email: moneybags48525@yahoo.com

Phone: 7346577470

General Comment

I think millions of Americans want guns to stay in video games, such as: Grand Theft Auto - Vice City. We COULD HAVE prevented the shooting at Sandy Hook, but Congress refused to act.

Why should a parent have to cope with having to lay his son or daughter to rest with the lord? Same can go if the deceased was a friend to his or her peers

PUBLIC SUBMISSION

As of: 7/12/18 1:30 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-9xxe
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0412

Public Comment 187. Individual. Leanne Yerby. 7-3-18

Submitter Information

Name: Leanne Yerby

Address:

1900 Main Street, 5th Floor
Irvine, CA, 92614

Email: lyerby@allenmatkins.com

Phone: 9495531313

Fax: 92614

General Comment

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. That is why I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/12/18 1:31 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-xz0z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0413

Public Comment 188. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

It seems amazing to me that a president who claims to be creating new immigration barriers under the guise of national security will allow an easier way for fire arms to be sold to foreign buyers. This seems like a move that would make our borders less secure and our nation less secure as well as those around the world than the many innocent families seeking asylum whom are turning away from our borders and imprisoning. This proposed rule is a bad decision for other reasons as well:

-It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

-It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

-It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: 7/12/18 1:32 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-4ga9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0414

Public Comment 189. Individual. Perry Levin. 7-3-18

Submitter Information

Name: Perry Levin

Address:

11923 arklawn Dr.
Apt. 103
Rockville, MD, 20852

Email: p.s.levin@att.net

Phone: 3017700434

Organization: PSL

General Comment

There are more than enough guns circulating in the population. We do not need more guns; we need more restrictions.

PUBLIC SUBMISSION

As of: 7/12/18 1:33 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-l4ir
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0415

Public Comment 190. Individual. GEORGIA MORGAN. 7-3-18

Submitter Information

Name: GEORGIA MORGAN

General Comment

I oppose this rule change. Switching the regulations on firearms exports from the U.S. State Department to the U.S. Commerce Department puts people all over the world at risk, for the benefit of a few gun manufacturers, because the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/12/18 1:37 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-gqwi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0416

Public Comment 191. Individual. Janiece Staton. 7-3-18

Submitter Information

Name: Janiece Staton

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

The Commerce Department has inadequate staff to be monitoring the flow of firearms into and out of the USA. Thus, dangerous players on the domestic and foreign fronts would have far greater access to the destructive devices they seek. In addition, the shift would eliminate the State Departments Blue Lantern program, that has been in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Furthermore, it would remove licensing requirements for brokers, increasing the risk of trafficking. Finally, it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. My Congress members must have direct knowledge and formal input regarding the flow of arms that leave USA soil. The security of my family, neighborhood, nation, and planet depend upon thoughtful, responsible, ethical oversight and monitoring of all weapons of war and extortion. I do not trust military-industrial complex corporations nor the Commerce Department to be effective or reliable in this regard.

PUBLIC SUBMISSION

As of: 7/12/18 1:39 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-s2cc
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0417

Public Comment 192. Individual. Faith Parker. 7-3-18

Submitter Information

Name: Faith Parker

General Comment

oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This would seriously jeopardize national security as well as the security of other free democracies. It would be a decision in favor of big business interest rather than a decision in the interests of safety and security

PUBLIC SUBMISSION

As of: 7/12/18 1:40 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-7stw Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0418

Public Comment 193. Individual. Robin Morgan. 7-3-18

Submitter Information

Name: Robin Morgan

Address:

75 Maple St

Brattleboro, VT, 05301

Email: robinlmorgan@gmail.com

General Comment

I strongly oppose this rule change. The Department of commerce is not equipped to effectively oversee firearms sales overseas and this change either make it much easier for terrorists and criminals overseas to acquire large stockpiles of weapons. Additionally it would eliminate the legal prohibition of 3D printing firearms, resulting in untraceable and unregistered weapons here in the US, hobbling law enforcement.

PUBLIC SUBMISSION

As of: 7/12/18 1:41 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-zg7o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0419

Public Comment 194. Individual. Priscilla Skerry. 7-3-18

Submitter Information

Name: Priscilla Skerry

Address:

Portland, ME, 04102-3781

Email: drskerry@myfairpoint.net

Phone: 2077808063

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

I am very concerned about this tactic by the NRA. It must be stopped...for the safety of our Nation and all of the world's citizens. I expect responsible action be taken to prevent the NRA from getting away with this. Thank you.

Priscilla Skerry
Portland, Maine 04102

PUBLIC SUBMISSION

As of: 7/12/18 1:41 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-frh2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0420

Public Comment 195. Individual. Rev. Allan B. Jones. 7-3-18

Submitter Information

Name: Rev. Allan B. Jones

Address:

722 Orchard Street #2
Santa Rosa, CA, 95404

Email: revabjones@att.net

Phone: 0000000000

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It appears to be a poorly disguised effort to increase arms sales around the world, and lead to more unnecessary deaths and other suffering. Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 1:42 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-mkbf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0421

Public Comment 196. Anonymous. 7-3-18

Submitter Information

Name: anonymous anonymous

General Comment

Americans, as well as citizens of the world are depending on you to put our safety above profit.

I am writing to strongly urge you to not change the regulation of firearms exports from the State Department to the Commerce Department. It would facilitate firearms exports to unstable, oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

We seriously need you to stand up to profiteering pressure and NOT ALLOW an increase of guns to be released into an already unstable arena. It would not be the responsible thing to do. Our families deserve to live with greater security than this would encourage. Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 1:43 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-vfhj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0422

Public Comment 197. Individual. Kathryn Kram. 7-3-18

Submitter Information

Name: Kathryn Kram

Address:

4216 Fairfax Dr.

Columbus, OH, 43220

Email: katykram@gmail.com

Phone: 6144512279

General Comment

I oppose the transfer of regulations that control the sale of firearms from the Department of State to the Department of Commerce. This is not in keeping with national security and might allow arm sales to regimes that are dangerous.

I urge you to continue to classify firearms as "military" . To have them controlled simply as goods for sale is dangerous.

PUBLIC SUBMISSION

As of: 7/12/18 1:44 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-27fp Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0423

Public Comment 198. Individual. Michael Beeston. 7-3-18

Submitter Information

Name: Michael Beeston

Address:

155 OAK MEADOW RD
MOORESVILLE, 28115

Email: mbeeston@mac.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I strongly oppose this rule change.

PUBLIC SUBMISSION

As of: 7/12/18 1:45 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-c5wu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0424

Public Comment 199. Individual. Morgan Clark. 7-3-18

Submitter Information

Name: Morgan Clark

Address:

SOUTH ORANGE, NJ, 07079

Email: morgan.cl@gmail.com

General Comment

I object to this proposal and demand that weapons exports continue to be treated as military armaments. The proposal would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, would remove licensing requirements for brokers, increasing the risk of trafficking, and would remove the State Departments block on the 3D printing of firearms. I demand this proposal be rejected.

PUBLIC SUBMISSION

As of: 7/12/18 1:46 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-mld6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0425

Public Comment 200. Individual. Rev. Alison Hyder. 7-3-18

Submitter Information

Name: Rev. Alison Hyder

General Comment

I do not believe that your department is the best agency to monitor the destination of all dangerous arms. Please do not allow this responsibility to be added to all that you currently manage. I cannot imagine that this would enhance national security.

Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 1:47 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-rki5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0426

Public Comment 201. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Corporate greed at its worst. The NRA and gun manufacturers are fine with making this already dangerous world more dangerous. Charming. If this broken government goes along with this, it will make clear that human lives are nothing. Money is far more important than any human beings.

PUBLIC SUBMISSION

As of: 7/12/18 1:48 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-j601
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0427

Public Comment 202. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose gun sales being made thru the commerce dept.

PUBLIC SUBMISSION

As of: 7/12/18 1:49 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-q83h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0428

Public Comment 203. Individual. Alice Pfister. 7-3-18

Submitter Information

Name: Alice Pfister

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I respectfully request that you do not allow this change to take place. Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 1:50 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-jeth Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0429

Public Comment 204. Individual. nick burns. 7-3-18

Submitter Information

Name: nick burns

Address:

PARK CITY, UT, 84098

Email: nick@vanburns.com

Phone: 8019573097

General Comment

I do not support the rule change to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This is bad policy, which would increase gun trafficking, and eliminate appropriate Congressional oversight.

PUBLIC SUBMISSION

As of: 7/12/18 1:50 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-q4lr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0430

Public Comment 205. Individual. Emily Miller. 7-3-18

Submitter Information

Name: Emily Miller

General Comment

The United States should not make it easier to export guns!

PUBLIC SUBMISSION

As of: 7/12/18 1:51 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-uadr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0431

Public Comment 206. Individual. Kacie Shelton. 7-3-18

Submitter Information

Name: Kacie Shelton

Address:

Pasadena, CA, 91101

Email: kacie@ofb.net

Phone: 6263725709

General Comment

Please do not enact the proposed rule; firearms should continue to be controlled under the USML.

We are now seeing what is only the start of mass migration from countries where arms have flooded into the hands of criminal organizations, paramilitary organizations, and drug gangs. If we can't welcome those fleeing increased violence with open arms in the United States, we should not make it even easier for bad elements to get more guns, and thus increasing the flood of asylum seekers. This would be self-defeating on many other fronts, before discussing the already atrocious handling of immigrants by ICE.

Please do not enact the proposed rule. Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 1:52 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-kl56
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0432

Public Comment 207. Individual. john north. 7-3-18

Submitter Information

Name: john north

General Comment

I absolutely oppose any rule change that switches the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/12/18 1:53 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-xk23
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0433

Public Comment 208. Individual. Wayne Wunderlin. 7-3-18

Submitter Information

Name: Wayne Wunderlin

General Comment

I OPPOSE THIS RULE CHANGE THAT WOULD SWITCH THE REGULATIONS OF FIREARMS EXPORT FROM THE U S STATE DEPT. TO THE U S COMMERCE DEPT. THIS WOULD BE MUCH MORE DANGEROUS FOR PEOPLE EVERYWHERE !!!!!

PUBLIC SUBMISSION

As of: 7/12/18 1:54 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-7ci7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0434

Public Comment 209. Individual. Glenn Williams. 7-3-18

Submitter Information

Name: Glenn Williams

Address:

16 Park Place

Brooklyn, 11217

Email: gloonie@gmail.com

Phone: 3473834687

Fax: 11217

General Comment

This proposed rule is rubbish. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

I strongly oppose implementation of this rule, which is wrong on the face of it, and will place export controls in the hands of an agency that lacks the necessary resources.

PUBLIC SUBMISSION

As of: 7/12/18 1:54 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-dsau
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0435

Public Comment 200. Individual. C. Flannery. 7-3-18

Submitter Information

Name: C. Flannery

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is VERY important that the state department be fully aware of the sale of large quantities of firearms. There should also be a limit on how many firearms are sold each year. The world needs less guns not more!!! The guns that are made should only be in the hands of people with extensive training.

PUBLIC SUBMISSION

As of: 7/12/18 2:49 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-y6hp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0436

CoPublic Comment 211. Individual. Hope Mays. 7-3-18

Submitter Information

Name: Hope Mays

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Selling arms abroad has not worked out so well in the past.

PUBLIC SUBMISSION

As of: 7/12/18 2:52 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-a64e
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0437

Public Comment 212. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am writing to express my opposition of switching the regulation of firearms exports from the State Department to the Commerce Department. This change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. I believe we currently have too few regulations over firearms in our country and in our international relations, and do not feel like this is the correct direction to take our arms regulation.

PUBLIC SUBMISSION

As of: 7/12/18 2:53 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-wyrc Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0438

Public Comment 213. Individual. karen toscos. 7-3-18

Submitter Information

Name: karen toscos

Address:

fort wayne, IN, 46845

Email: k.toscoss@att.net

Phone: 6505551212

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You are supposed to safeguard the nation against gun violence, instead you are promoting it in a backhanded way. Shame on all of you.

PUBLIC SUBMISSION

As of: 7/12/18 2:54 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-6405
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0439

Public Comment 214. Individual. Margaret Silvers. 7-3-18

Submitter Information

Name: Margaret Silvers

General Comment

I strongly oppose the change in regulation that would mean Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/12/18 2:55 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-wiix
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0440

Public Comment 215. Individual. Julie Blum. 7-3-18

Submitter Information

Name: Julie Blum

Address:

Liberty Lake, WA, 99019

Email: julesflwr@yahoo.com

Fax: 99019

General Comment

I oppose this rule change. Firearms exports should continue to be classified as military.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

PUBLIC SUBMISSION

As of: 7/12/18 2:56 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-iukl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0441

Public Comment 216. Individual. Donald Dilg. 7-3-18

Submitter Information

Name: Donald Dilg

General Comment

I would strongly oppose any rule change that would make the selling of firearms, especially to foreign nations, or agents of foreign powers, easier to transact or subject to less oversight and control than is currently required.

PUBLIC SUBMISSION

As of: 7/12/18 2:56 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-4kc5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0442

Public Comment 217. Individual. Alix Keast. 7-3-18

Submitter Information

Name: Alix Keast

Address:

214 Riverside Drive
New York, NY, 10025

Email: Aixk3@gmail.com

Phone: 2123624341

General Comment

I oppose this legislation which would transfer oversight of international gun sales from the State Department to the US Department of Commerce. We do not need any more non-military people, US or international, owning military style machine guns.

Thank you for protecting world order.

PUBLIC SUBMISSION

As of: 7/12/18 2:57 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-bped
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0443

Public Comment 218. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

The State Department should by all means retain the authority to handle export licenses of semiautomatic assault weapons and other powerful firearms. The transfer of that authority to the Commerce Department would kill a program that carries out post-shipment & pre-license inspections, eliminate licensing requirements that hamper trafficking, and open the way for anyone to make 3d printed weapons. Also, the State Department alone can give notice to Congress to block weapons sales that could jeopardize our security. For all these reasons, the proposed transfer should be abandoned, as it would make us considerably less safe.

PUBLIC SUBMISSION

As of: 7/12/18 2:58 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-irmw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0444

Public Comment 219. Individual. Victoria Meguid. 7-3-18

Submitter Information

Name: Victoria Meguid

Address: United States,

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Congress should know when large amounts of firearms are being sold to other countries. guns go to Mexico illegally and look what has happened there- thousands of deaths in the last year with American guns.

Just like many of the other changes in this country in the last 18 months this is dangerous this is not what we should be doing to keep a peaceful world. it is just lining the pockets of the gun makers.

Be responsible.

Thank you.

PUBLIC SUBMISSION

As of: 7/12/18 2:59 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-px9m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0445

Public Comment 220. Individual. Jessica Rettig. 7-3-18

Submitter Information

Name: Jessica Rettig

Address:

111 W. College Street
Granville, 43023

Email: jessica_rettig@ymail.com

Phone: 740-587-9847

General Comment

I am writing to strongly object to the proposed changes in the United States' proposed rule on the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML).

Right now, firearms exports are classified as military. This is why firearm exports are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. This is a good policy and it helps keep the world and Americans safe.

If the regulation of firearm exports is changed to regulation by the Department of Commerce and the Bureau of Industry and Security (BIS), then exports of firearms will be less regulated and firearms will fall into the wrong hands around the world. Indeed, the Department of Commerce is not charged with safeguarding the USA, that's the job of the State Department, so it should regulate firearm export. Also I am concerned that the BIS does not have the ability or resources to effectively monitor and control the export of firearms. Thus firearms will spread across the world and firearms will find their way back into the United States, where they can be used against innocent children. In fact, if the Department of Commerce is in control of firearms exports, then Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Please do not shift control of firearms exports to the Department of Commerce and the BIS. Such a move will generate bloodshed across the globe and here are home in America. We must avoid such a future and prevent

more gun and firearm violence.

PUBLIC SUBMISSION

As of: 7/12/18 3:00 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-kdam Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0446

Public Comment 221. Individual. Isaiah Plovnick. 7-3-18

Submitter Information

Name: Isaiah Plovnick

General Comment

I vehemently oppose this irresponsible, unethical, and frankly amoral rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/12/18 3:01 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-juxg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0447

Public Comment 222. Individual. Richard Booth. 7-3-18

Submitter Information

Name: Richard Booth

Address:

26250 Dreschfield

Grosse Ile, MI, 48138-1601

Email: rtbooth6@yahoo.com

Phone: 7348183355

Fax: 48138-1601

General Comment

I oppose the rule change! Keep it in State!

PUBLIC SUBMISSION

As of: 7/12/18 3:02 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-s3r7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0448

Public Comment 223. Individual. Jeremy Becker. 7-3-18

Submitter Information

Name: Jeremy Becker

Address:

4514 17th St

San Francisco, CA, 94114

Email: Jeremy.p.becker@gmail.com

Phone: 4157262556

General Comment

All firearms are military. All should be handled by the us state department as such. I do not approve of this shift.

PUBLIC SUBMISSION

As of: 7/12/18 3:03 PM Received: July 03, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-942p-ybnv Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0449

Public Comment 224. B Anonymous. 7-3-18

Submitter Information

Name: B Anonymous

Address:

PO Box 1724

OR,

Phone: 5415362439

General Comment

Keep the authority with the U.S. State Department.
Do NOT change the rules.

PUBLIC SUBMISSION

As of: 7/12/18 3:06 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-nw34
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0450

Public Comment 225. Individual. Nina Diamante. 7-3-18

Submitter Information

Name: Nina Diamante

General Comment

Make all manufacture or sale of any firearms illegal in the U.S.A. with a huge fine and imprisonment for anyone, manufacturing, selling either firearms or ammunition. We have had enough people killed and maimed.

PUBLIC SUBMISSION

As of: 7/12/18 3:07 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-w30j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0451

Public Comment 226. Individual. Elise Margulis. 7-3-18

Submitter Information

Name: Elise Margulis

General Comment

It's a very bad idea to eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[]

Removing licensing requirements for brokers will increase the risk of trafficking.

Removing the State Departments block on the 3D printing of firearm is a terrible plan. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Sincerely,
Elise Margulis

PUBLIC SUBMISSION

As of: 7/12/18 3:08 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-x9ve
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0452

Public Comment 227. Individual. Anna Feldman. 7-3-18

Submitter Information

Name: Anna Feldman

Address:

5659 Sunset Falls Drive

Apollo Beach, 33572

Email: sfeldman01@verizon.net

Phone: 7076285399

Fax: 33572

General Comment

To Whom it may concern:

There is a push to transfer control of firearms to the Department of Commerce which does not have the resources to oversee the transfer of these weapons particularly if they are allowed to be sold in other countries. Our country's security would be at risk once these weapons leave our boundaries. Below are several other very important reasons why this transfer should not happen.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: 7/12/18 4:26 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-qpvm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0453

Public Comment 228. Individual. Virginia Jastromb. 7-3-18

Submitter Information

Name: Virginia Jastromb

General Comment

The Commerce Department does not have the sources to enforce arms sales to foreign countries. The State Department has that ability.

PUBLIC SUBMISSION

As of: 7/12/18 4:27 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-4ij0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0454

Public Comment 229. Individual. Debra Cunningham. 7-3-18

Submitter Information

Name: Debra Cunningham

General Comment

I oppose the rule change to allow semi-automatic weapons to be licensed through the department of commerce instead of the state department. The US is already the leader in gun violence and the last thing we need to do is export our problem.

PUBLIC SUBMISSION

As of: 7/12/18 4:27 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-knh1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0455

Public Comment 230. Individual. Gina Bates. 7-3-18

Submitter Information

Name: Gina Bates

Address:

40 South St

Apple Creek, OH, 44606

Email: star3609@aol.com

Phone: 3306986195

General Comment

I OPPOSE the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Guns are already out of control. We do NOT need any more.

LEAVE THE RULE IN PLACE, UNCHANGED!

PUBLIC SUBMISSION

As of: 7/12/18 4:30 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942p-bitl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0456

Public Comment 231. Individual. Chip Sharpe. 7-3-18

Submitter Information

Name: Chip Sharpe

Address:

1644 Old Arcata Road

Bayside, CA, 95524-9301

Email: chipsharpe@sbcglobal.net

General Comment

I am aware that the State Departments Blue Lantern program provides critical controls over arms exports. We cannot allow less regulated sales of weapons to further tarnish the world's view of our nation as a rogue state willing to inflict destruction wherever a market for murderous firearms can be found. Commerce Department does not have the resources to govern international arms sales. Please do not allow current regulations to be weakened.

PUBLIC SUBMISSION

As of: 7/13/18 9:27 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-10ik
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0525

Public Comment 232. Individual. Robert Haslag. 7-3-18

Submitter Information

Name: Robert Haslag

Address:

10513 Bryant Rd
Centertown, MO, 65023

Email: bobhaslag@gmail.com

Phone: 5735843525

Fax: 65023

General Comment

Sir,

I would like to address the proposed rule change on which department should control gun sales. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Considering the national security interest AND the inability of Commerce to actually handle the job, I propose that doing this would be clearly the wrong thing to do.

PUBLIC SUBMISSION

As of: 7/13/18 9:33 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-p63k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0530

Public Comment 233. Individual. Zareen Kapadia. 7-3-18

Submitter Information

Name: Zareen Kapadia

Address:

Durham, NC, 27704

Email: zareen.kapadia@gmail.com

Phone: 9195191249

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/13/18 9:34 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-mk3d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0532

Public Comment 234. Individual. Karen Davis. 7-3-18

Submitter Information

Name: Karen Davis

Address:

243 W Amoroso Dr
Gilbert, AZ, 85233

Email: karen.davis@asu.edu

Phone: 4808921266

General Comment

America has the highest number of guns--and gun deaths--of ANY developed country in the world. Mass shootings are becoming commonplace, to the horror and embarrassment of every logically thinking, peace-loving citizen. WHY on earth would we want to export our PROBLEM to the rest of the world? NO--the NRA . . . and American gun manufacturers . . . should NOT have the ability to architect the demise of our fellow human beings. NO LEGALIZED GUN TRAFFICKING!!!

PUBLIC SUBMISSION

As of: 7/13/18 9:35 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-ww5s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0534

Public Comment 235. Individual. Louise Kaufman. 7-3-18

Submitter Information

Name: Louise Kaufman

Address:

1502 Meadowbrook Drive

Mason City, IA, 50401

Email: louisek@mchsi.com

Phone: 6414242138

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change would mean that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/13/18 9:36 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-o6vl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0535

Public Comment 236. Individual. William White. 7-3-18

Submitter Information

Name: William White

Address:

Fort WaltonBeach, United States, 32548

Email: u2rhuman@earthlink.net

Phone: 8502435247

Organization: Retired

General Comment

: I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. There should be extremely tight rules concerning any export of guns or weaponry in world increasingly plagued with violence. Please assure such a deadly factor for civilization be treated with the urgency it deserves. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 9:37 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942p-l5r9 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0537

Public Comment 237. Individual. Don Gentz. 7-3-18

Submitter Information

Name: Don Gentz

General Comment

I wish to express my opposition to the rule change that would allow the Commerce Department (focused on promoting American business) --not the State Department (focused on safeguarding our nation) -- to handle export licenses of semiautomatic assault weapons and other powerful firearms. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. The marketing of these weapons to firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would create many long-term and intractable problems in international relations and imperil lives everywhere. The safety and security of our nation and the marketing of large caches of American guns and ammunition are incompatible. Please do not take part in making the world a more dangerous and violent place.

PUBLIC SUBMISSION

As of: 7/13/18 9:38 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-3u8j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0538

Public Comment 238. Individual. Judith Fletcher. 7-3-18

Submitter Information

Name: Judith Fletcher

Address:

Bronx, NY,

Email: jfletcher@riverdale.edu

General Comment

I write to strongly urge you not to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department, which is focused on safeguarding our nation, to the U.S. Commerce Department, which is focused on promoting American business. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Keeping firearms exports classified as military allows Congress to monitor and block sales of large batches of firearms to foreign countries. I am deeply concerned that with the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

In addition, I don't believe that the Commerce Department has the resources to adequately enforce export controls.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Specifically,

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder

Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The proposed rule change would make the world a far more dangerous place. Please do not put the financial interests of firearms sellers ahead of the safety and well-being of citizens everywhere.

PUBLIC SUBMISSION

As of: 7/13/18 9:39 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-ci4h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0539

Public Comment 239. Individual. Mark Meeks. 7-3-18

Submitter Information

Name: Mark Meeks

Address:

399 Blackbird
Bailey, CO, 80421

Email: mkenosha@aol.com

Phone: 303 8161454

General Comment

Far too much gun violence haunts our world. We are all wounded. Too many guns are endangering all of us. The Commerce Department does not have the resources to protect us from the arms trade. That huge challenge belongs far more appropriately to the State Department. Please oppose any change to our countrys governance regarding the trade in guns.

PUBLIC SUBMISSION

As of: 7/13/18 9:40 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942p-cs74
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0540

Public Comment 240. Individual. Todd Heiler. 7-3-18

Submitter Information

Name: Todd Heiler

Address:

4976 Van Dyke Ct
ARCATA, 95521

Email: tbh1924@outlook.com

Phone: 7078453475

Fax: 95521

General Comment

This action is not advised. It will threaten national security by making it easier for terrorists and other enemies to have access to these weapons and to turn those weapons on Americans. The NRA and gun manufacturers have a right to make money, but not if that right endangers national security. Second amendment rights do not trump the right to life and security. National security and personal safety should not be sacrificed for the sake of greed. I speak as a military veteran and as someone who has served in law enforcement and private security. I also hold a Bachelor of Science degree in Criminal Justice. thank you.

PUBLIC SUBMISSION

As of: 7/13/18 9:42 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-fxz0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0541

Public Comment 241. Individual. Kata Orndorff. 7-3-18

Submitter Information

Name: Kata Orndorff

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department is not set up to evaluate if a particular sale could be dangerous to our country. Please do not make this rule change.

PUBLIC SUBMISSION

As of: 7/13/18 9:43 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-8yof
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0543

Public Comment 242. Individual. mary sherman. 7-3-18

Submitter Information

Name: mary sherman

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is jsut looking for more violence abroad and toward our citizens as welll as the peoples of this world. Seriously, how can you even consider this?

PUBLIC SUBMISSION

As of: 7/13/18 9:44 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-t68g
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0545

Public Comment 243. Individual. Charles La Rosa. 7-3-18

Submitter Information

Name: Charles La Rosa

Address:

34 Highlawn Rd
Brattleboro, VT, 05301

Email: charlie.larosa@gmail.com

Phone: 8023430401

General Comment

I am opposed to changing the purview of firearms export from the Department of State to the Department of Commerce. It appears that primary purpose of the change, as promoted by the NRA, is to loosen the restriction on the export of firearms including military-style semi-automatic weapons.

One of the primary reasons that individuals and families from Central American countries seek to gain asylum in the U.S. or to enter illegally is for personal safety and to escape the high levels of crime and violence in their countries of origin. A large percentage of the weapons used illegally in these countries are sourced in the U.S. They are smuggled into these countries from the U.S. through the efforts of unlawful and unscrupulous gun dealers and criminals.

So, as we attempt to stem the flow of asylum seekers and migrants, both legal and illegal, from these countries, we are at the same time contributing to the conditions that spur them to leave their homes.

I do not see how the transfer of oversight from State to Commerce will improve the current situation, which is what we should be doing, and not making a bad situation even worse.

Such a transfer would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder

Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I strongly urge you not to make this change and thereby make it easier for gun to move out of the U.S. into the hands of criminals and criminal gangs in Central America and other countries.

Please see references below.

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: 7/13/18 9:45 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-t2d3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0546

Public Comment 244. Individual. Catherine Lambeau. 7-3-18

Submitter Information

Name: Catherine Lambeau

General Comment

The proliferation of guns and automatic weapons is the cause of the ever increasing number of mass shootings in this country!!! Passing oversight to the commerce department would only increase the problem as they are concerned with commerce not safety

PUBLIC SUBMISSION

As of: 7/13/18 9:46 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-96ok
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0548

Public Comment 245. Individual. Barry Cheney. 7-3-18

Submitter Information

Name: Barry Cheney

General Comment

I oppose the plan to change the licensing of weapon exports from the State Department to the Commerce Department. The world is flooded with too many weapons which fuel wars and terrorism. Please dont change this.

PUBLIC SUBMISSION

As of: 7/13/18 9:46 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-al8z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0550

Public Comment 246. Individual. Catherine Kennedy Riggs. 7-3-18

Submitter Information

Name: Catherine Kennedy Riggs

General Comment

I am writing in opposition of changing the regulations regarding the export of firearms. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms manufacturers should not be allowed free reign in the distribution of their product due to the dangerousness posed to populations worldwide.

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

PUBLIC SUBMISSION

As of: 7/13/18 9:49 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-m0db
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0552

Public Comment 247. Individual. Marianne Hunter. 7-3-18

Submitter Information

Name: Marianne Hunter

General Comment

My family and I have just learned the the NRA is lobbying to move regulations of sales from US gun manufacturers from the Department of States to the Dept of Commerce. This Unacceptable and inappropriate .

No other nation in the world has a civilian population that is armed as ours is here. Who are the customers for these weapons? Terrorists, paramilitary groups and criminals. Will US weapons be used to kill our own military personnel? To kill our allies and friends? To kill vulnerable population groups? To kill American tourists? Without a doubt! Will the Dept of Commerce, whose purpose is to promote the sales of American products become an enabler of weapons dealers? Putting regulation of weapons sales under the Department of Commerce is a complete renunciation of every effort to control the flow of weapons that can and will be used against Americans (and other humans)! This is so anathema to the best interests of the USA, it crosses the line to treason, as it aids and abets the enemies of the United States of America.

You must use everything in your power to stop this descent into chaos.

Sincerely, Marianne Hunter and family

PUBLIC SUBMISSION

As of: 7/13/18 9:50 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-68bn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0553

Public Comment 248. Individual. Michael Gnat. 7-3-18

Submitter Information

Name: Michael Gnat

Address:

295 14th Street

Brooklyn, 11215-4911

Email: michaelgnat@yahoo.com

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department, thereby greatly weakening Congressional oversight of overseas arms sales. There are more than enough wars going on right now, and the US should not be in the business of creating more, or expanding the ones we have. There's much at stake in this world besides CORPORATE PROFITS!

PUBLIC SUBMISSION

As of: 7/13/18 9:57 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ugdi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0554

Public Comment 249. Individual. Sheila Kojm. 7-3-18

Submitter Information

Name: Sheila Kojm

Address:

7 Orchard Road

Bedford, MA, 01730

Email: boston_kojm@yahoo.com

General Comment

The State Department, not the Commerce Department, should regulate the sale of arms outside of the US. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

My additional concerns are that this switch would:

- * eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- * remove licensing requirements for brokers, increasing the risk of trafficking.
- * remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have the expertise, resources or global reach that State has to regulate arms sales to keep America safe from savvy overseas actors.

PUBLIC SUBMISSION

As of: 7/13/18 9:58 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-xy5j Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0555

Public Comment 250. Individual. Robin Hall. 7-3-1

Submitter Information

Name: Robin Hall

Address:

6610 Loblolly Circle

Waxhaw, NC, 28173

Email: rocnrobn37@gmail.com

Phone: 7048431741

General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department. The consequences of such a change could have terrible consequences not only to our security but to the entire world.

PUBLIC SUBMISSION

As of: 7/13/18 10:01 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-rqkg Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0556

Public Comment 251. Individual. Lawrence Jimenez. 7-3-18

Submitter Information

Name: Lawrence Jimenez

Address:

2530 Vasanta Way

Hollywood, CA, 90068

Email: lawrenj@pacbell.net

Phone: 3234699418

General Comment

Please show this Citizen where in the Constitution is the clause that allows for children to be eligible to die quicker to suit the needs of the nrapeuglican party?

PUBLIC SUBMISSION

As of: 7/13/18 10:04 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-rk98 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0557

Public Comment 252. Individual. Joyce Lewis. 7-3-18

Submitter Information

Name: Joyce Lewis

General Comment

Please do not consider opening the doors for sale of munitions. We should be regulating more, not less. How many killings do we need to witness before we understand the consequences of guns readily available to anyone?

PUBLIC SUBMISSION

As of: 7/13/18 10:09 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-chmi Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0558

Public Comment 253. Individual. Charles Wolfe. 7-3-18

Submitter Information

Name: Charles Wolfe

Address:

13376 Dronfield Ave.

Sylmar, CA, 91342

Email: cawolfe@verizon.net

Phone: 818 367-6798

General Comment

Please do all possible to keep weapons classified as military equipment and under jurisdiction of the State Department, especially export of same. They should not be treated as ordinary "good" for sale worldwide. They should not be under control of the U.S. Commerce Department as they are not like any other items under control of the Commerce Department.

Thank you in advance for considering my statement on this matter.

PUBLIC SUBMISSION

As of: 7/13/18 10:08 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-4kxi Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0559

Public Comment 254. Individual. Karen Sullivan. 7-3-18

Submitter Information

Name: Karen Sullivan

General Comment

How much will Trump make on this deal?

The NRA and gun manufacturers certainly have enough money

We don't need anymore guns ANYWHERE

PUBLIC SUBMISSION

As of: 7/13/18 10:10 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-9m15
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0560

Public Comment 255. Individual. Sasha Kay. 7-3-18

Submitter Information

Name: Sasha Kay

General Comment

I oppose this rule change because the Commerce Department doesn't have enough resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/13/18 10:11 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-kvs5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0561

Public Comment 256. Individual. Carol Hirth. 7-3-18

Submitter Information

Name: Carol Hirth

General Comment

I oppose switching regulation of fire arms exports from the State Department to the Department of Commerce which would remove safeguards against violence around the world.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

This would be dangerous and destructive to countries and people throughout the globe.

PUBLIC SUBMISSION

As of: 7/13/18 10:12 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-xt7o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0562

Public Comment 257. Individual. Helene Mayer. 7-3-18

Submitter Information

Name: Helene Mayer

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security.

The NSSF has already bragged that the rule would lead to a 20% increase in American gun exports. We can see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. Weapons such as these were not designed for personal use; they were designed for battlefield, which is why they are the weapons of choice for mass shooters.

PUBLIC SUBMISSION

As of: 7/13/18 10:13 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-rxud
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0563

Public Comment 258. Individual. Peter Gellatly. 7-3-18

Submitter Information

Name: Peter Gellatly

General Comment

Aloha,

I am writing to request that oversight of firearms exports remain with the U.S. Department of State, rather than shift to the Department of Commerce. There are numerous reasons for this, but chief among them is common sense. Commerce is charged with selling things. The Department of State has a loftier purpose, and within its purview is public safety, here and abroad.

Shifted to Commerce, guns become just another commodity, regardless of their deadly purpose and impact. At State there is civility and restraint, plus rigid guidelines honoring American responsibility.

Surely Commerce has better options for would-be customers than those very items that bring such pain and suffering to our own citizens.

Thank you very much.

aloha, Peter Gellatly

PUBLIC SUBMISSION

As of: 7/13/18 10:14 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-qo0j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0564

Public Comment 259. Individual. Jessica Brewer. 7-3-18

Submitter Information

Name: Jessica Brewer

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Do not make it easier for the US companies to sell weapons around the world. Weapons are not benign commerce. Weapons Commerce should be regulated more and controlled more, not less.

PUBLIC SUBMISSION

As of: 7/13/18 10:15 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ihg8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0565

Public Comment 260. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/13/18 10:16 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-7w6t
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0566

Public Comment 261. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The State Department has the resources and mandate to keep American guns out of the hands of oppressive regimes, international criminals, and terrorists - the Commerce Department does not.

For reasons of national security, the State Department should continue to handle firearms export regulations.

PUBLIC SUBMISSION

As of: 7/13/18 10:20 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ey1n
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0567

Public Comment 262. Individual. Henry Ickes. 7-3-18

Submitter Information

Name: Henry Ickes

General Comment

I oppose switching responsibility for the regulation of firearms exports from the US State Department to the US Commerce Department.

- This would eliminate the State Departments "Blue Lantern" program, which has been in place since 1940, carrying-out hundreds of pre-license and post-shipment inspections and publicly reporting on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. Background - when Defense Distributed founder Cody Wilson posted online instructions for how to manufacture weapons using 3D printers, the State Department successfully charged him with violating arms export laws - his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms both in the U.S. *and* around the globe. At that point, there's no safe place, anywhere.

And, so much for a market for US arms manufacturers when it's possible to make your own untraceable weapon.

Essentially, switching the regulation of firearms exports from the State Department to the Commerce Department would (1) make it easier to provide firearms to oppressive regimes, (2) remove safeguards to help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons (tough enough as it currently is), and (3) further fuel violence that destabilizes countries and causes mass migration. Is that what the United States is - an unscrupulous arms merchant? We criticize other countries for doing this - how is this maintaining high moral ground?

Any *truly* religious person would oppose this action.

PUBLIC SUBMISSION

As of: 7/13/18 10:21 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-q8xj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0568

Public Comment 263. Individual. Dwight Sanders. 7-3-18

Submitter Information

Name: Dwight Sanders

Address:

5176 Belmonte Drive
Rochester, MI, 48306

Email: dwightsanders@hotmail.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports would facilitate making weapons available to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is too dangerous and must not be allowed!

PUBLIC SUBMISSION

As of: 7/13/18 10:28 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-we3k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0569

Public Comment 264. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am opposed to this change because there already is a serious problem with gun proliferation where the chief aim is greed and

the profit motive regardless of the consequences of this irresponsible proliferation of guns which this change will allow. This

proposal appears to ignore completely the moral issue of what needs to be done and the consequences of what will ensue.

PUBLIC SUBMISSION

As of: 7/13/18 10:29 AM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-i9wn Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0570

Public Comment 265. Individual. Cat McDonnell. 7-3-18

Submitter Information

Name: Cat McDonnell

General Comment

Please do not change the rules. There are too many people now with guns that shouldn't have them. The NRA has far too much influence on our politicians.

PUBLIC SUBMISSION

As of: 7/13/18 10:29 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-hcc6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0571

Public Comment 266. Individual. Nancy Dorian. 7-3-18

Submitter Information

Name: Nancy Dorian

General Comment

I oppose the rule change that would switch the regulations of firearms export from the US State Dept. to the US Dept. of Commerce. The Commerce Dept. has neither the resources nor the staff to adequately enforce export controls. Furthermore, the rule change would remove the State Dept.'s block on 3D print weapons, remove licensing requirements for brokers, thereby increasing the risk of trafficking, and it would eliminate the State Dept.'s Blue Lantern program.

PUBLIC SUBMISSION

As of: 7/13/18 10:30 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-nxwr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0572

Public Comment 267. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

This proposal would be disastrous. It would allow munitions to fall into terrorists hands and allow them to create them via 3D technology.

PUBLIC SUBMISSION

As of: 7/13/18 10:31 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-t9qk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0573

Public Comment 268. Individual. Joan Tramontano. 7-3-18

Submitter Information

Name: Joan Tramontano

Address:

1010 Wexford Blvd
Venice, FL, 34293-4354

Email: JoanT814@aol.com

Phone: 9413758695

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PLEASE don't let this happen. It is wrong and will make the world more violent and dangerous than ever. The National Rifle Association has no right to lobby for this outrageous change in United States regulations and policy.

PUBLIC SUBMISSION

As of: 7/13/18 10:32 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ezqg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0574

Public Comment 269. Individual. Emily Moran. 7-3-18

Submitter Information

Name: Emily Moran

Address:

Merced, CA, 95340

Email: moranemily42@gmail.com

Phone: 2093544651

General Comment

I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The state department is focused on the safety of our nation, which is what firearms export should be about, not commerce. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. It would also remove licensing requirements for brokers, increasing the risk of weapons trafficking. Such changes would make our country - and people in other countries - less safe.

PUBLIC SUBMISSION

As of: 7/13/18 10:33 AM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-e0i8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0575

Public Comment 270. Individual. james talbot. 7-3-18

Submitter Information

Name: james talbot

Address:

Austin, TX, 78704

Email: talbot@talbotworld.com

Phone: 5125555555

General Comment

For security purposes, I am against any rule change that would change the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Smells real fishy to me.

PUBLIC SUBMISSION

As of: 7/13/18 1:08 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-mytq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0617

Public Comment 271. Individual. Ellen Zarter. 7-3-18

Submitter Information

Name: Ellen Zarter

Address:

18319 NE 19th Pl

Bellevue, 98008

Email: ellenzarter@gmail.com

Phone: 4256446054

Fax: 98008

General Comment

Allowing the export of firearms presents a clear and present danger to our own country. I cannot believe this idea will be seriously considered. All those guns abroad will come back to haunt us. I would hope that other countries would forbid such sales. But they shouldn't have to. WE should prevent them from being exported. This is crazy.

PUBLIC SUBMISSION

As of: 7/13/18 1:10 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-2t15
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0618

Public Comment 272. Individual. Vonny Eckman. 7-3-18

Submitter Information

Name: Vonny Eckman

Address:

1417 Holly Pike

Carlisle, PA, 17015

Email: voneckman@yahoo.com

Phone: 7172415287

General Comment

I am completely against a move to change rules for firearms to be sold to other countries from the Dept. of State to the Dept. of Commerce. While we expect other countries not to interfere with our regulations, someone wants to make weapons just another commodity so that the rich capitalists can become even richer and the world less safe! At a time where we have bee at constant war, and expect other countries to stop making weapons, the powers that be in DC find this action acceptable???

I deplore the expansion of more weapons to be sold and certainly not through the commerce Dept. in order to avoid Congress. Have we elected a dictator or a President of a Great Democracy! This action in no way makes for peace and neither does a stupid military parade the wastes our hard-earned tax dollars for no purpose!

I am completely against both actions and want the powers that be to take notice. Thank you for listing and acting against such insanity!

PUBLIC SUBMISSION

As of: 7/13/18 1:11 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-1551
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0619

Public Comment 273. Individual. Kathryn Riss. 7-3-18

Submitter Information

Name: Kathryn Riss

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and gives Congress the ability to block sales of large batches of firearm to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department lacks the resources to enforce export controls adequately. Under the proposed rule change, this lack of enforcement and transparency would allow firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain large caches of American guns and ammunition much more easily than they can now.

PUBLIC SUBMISSION

As of: 7/13/18 1:12 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-lvyb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0620

Public Comment 274. Individual. Rebecca Gillespie. 7-3-18

Submitter Information

Name: Rebecca Gillespie

General Comment

I oppose this rule change switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/13/18 1:13 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-lzhz Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0622

Public Comment 275. Individual. Jennifer Biswas. 7-3-18

Submitter Information

Name: Jennifer Biswas

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

We must safeguard the interests of our nation rather than relax regulations for the purposes of making money for gun manufacturers.

PUBLIC SUBMISSION

As of: 7/13/18 1:28 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ilq9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0629

Public Comment 276. Individual. James Cunningham. 7-3-18

Submitter Information

Name: James Cunningham

Address:

Powell, OH, 43065

Email: james.cunningham@earthlink.net

Phone: 6143260730

Organization: Guitar Instruction

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is an incredibly bad idea the origin of which lies in a basis of greed and nothing else. To allow easier export of weapons with less oversight defies sound reasoning, common sense, and simple logic. We in the USA already have a severe problem with too many guns in the wrong hands as evidenced by the massive increase in mass shootings, the likes of which were exceptionally rare in our past. Why would we want to export that? If anything, we need to make it far more difficult to export weapons in order to address the all too common violence around the world. This is yet another senseless and foolish idea from the most corrupt administration in our nations history.

PUBLIC SUBMISSION

As of: 7/13/18 1:43 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ru0s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0633

Public Comment 277. Individual. Gregory Fite. 7-3-18

Submitter Information

Name: Gregory Fite

Address:

1751 Kudu Court

Hayward, CA, 94541

Email: greg.fite@gmail.com

Phone: 510-583-0511

General Comment

I oppose the proposed rule change that would switch oversight of arms sales from the State Department to the Department of Commerce. This is an open invitation to uncontrollable arms sales for profit, over the interests of national security and public safety.

PUBLIC SUBMISSION

As of: 7/13/18 1:44 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-zogf Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0635

Public Comment 278. Individual. Chris Casper. 7-3-18

Submitter Information

Name: Chris Casper

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, making us all less safe. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/13/18 1:45 PM Received: July 03, 2018 Status: Pending_Post Tracking No. 1k2-942q-hims Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-DRAFT-0685

Comment on FR Doc # 2018-10367

Submitter Information

Name: Greg Sells

General Comment

I am opposed to the move of regulating firearms exports from the Department of State to the Department of Commerce. Commerce does not have enough staff to adequately enforce export controls. State currently has the Blue Lantern program, dating to 1940, which conducts pre-license and post-shipment inspections and publicly reports on them. That would disappear under Commerce. Also, licensing requirements for brokers and bans on 3D printing of weapons would be removed. With Congress no longer notified of arms sales to repressive regimes such as the Philippines and Turkey, the world would be a more dangerous place.

PUBLIC SUBMISSION

As of: 7/13/18 1:51 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-7k6s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0637

Public Comment 280. Individual. Eric Scheihagen. 7-3-18

Submitter Information

Name: Eric Scheihagen

General Comment

I strongly oppose this proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The export of firearms has serious national security, geopolitical and human rights implications, and should continue to be regulated by the State Department.

PUBLIC SUBMISSION

As of: 7/13/18 1:53 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-nwwl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0638

Public Comment 281. Individual. Jen Han. 7-3-18

Submitter Information

Name: Jen Han

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not change the location of this regulatory responsibility.

PUBLIC SUBMISSION

As of: 7/13/18 1:58 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-azlp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0639

Public Comment 282. Individual. Amrita Burdick. 7-3-18

Submitter Information

Name: Amrita Burdick

General Comment

The Commerce Department does not have staff to adequately monitor arms sales, nor does it have a vested interest in keeping the world sane and peaceful. Opening arms sales to anyone (think organized crime, terrorist groups) would make the US and the world less safe.

Given the current world situation with civilians dying in ever so many places, it makes a lot more sense to keep arms traffic under the Department of State, where arms sales can be monitored appropriately. Human lives are more valuable than money. It's time to get US policies back in line with international mores and with our common values.

PUBLIC SUBMISSION

As of: 7/13/18 2:05 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-tegr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0641

Public Comment 283. Individual. Rick Belding. 7-3-18

Submitter Information

Name: Rick Belding

Address:

Santa Rosa, CA, 95404

Email: rickb-interests@stanfordalumni.org

Phone: 7074775060

Organization: Richard

General Comment

Please leave the control of firearms sales to the Department of State. There is no reason to allow uncontrolled sales of firearms and related articles beyond profit. World Health and our own national security would be damaged by the proposed change. Thank you for denying the change.

PUBLIC SUBMISSION

As of: 7/13/18 2:07 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-op5n
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0644

Public Comment 284. Individual. Croitiene ganMoryn. 7-3-18

Submitter Information

Name: Croitiene ganMoryn

Address:

6211 SE 24th Ave

Ocala, FL, 34480

Email: adanto@jps.net

Phone: 3526204708

General Comment

I oppose this rule change.

With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with

access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you

PUBLIC SUBMISSION

As of: 7/13/18 2:08 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-iw47
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0645

Public Comment 285. Individuals. Barbara and Jim Dale. 7-3-18

Submitter Information

Name: Barbara and Jim Dale

Address:

909 Vernon St.

Decorah, IA, 52101

Email: nonrev909@neitel.net

Phone: 5633824693

General Comment

We strongly oppose the change that would place the sales of firearms internationally under the control of the Department of Commerce rather than the Department of State as has been the law.

Too many dangers exist in this proposal which seems to be based solely on profit motives.

Some of the changes that will cause problems are

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

We see the proliferation of guns anywhere as a threat to security, life and limb. To extend the curse that our country has come under to others around the world seems profoundly cruel and inhumane.

PUBLIC SUBMISSION

As of: 7/13/18 2:10 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ipzp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0646

Public Comment 286. Individual. Donna Bryant. 7-3-18

Submitter Information

Name: Donna Bryant

Address:

6210 E. Bristol Harbour Circle
Houston, TX, 77084

Email: schpinna@yahoo.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Naturally, arms manufacturers would like this change because they are the most vile people on earth, dealing in death almost as a form of currency. They have enough money; ditch this attempt to give them even more obscene profits by exporting death and destruction.

PUBLIC SUBMISSION

As of: 7/13/18 2:11 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-4k61
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0647

Public Comment 287. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

We do not need to change this rule. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/13/18 2:12 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-v6xi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0648

Public Comment 288. Individual. Kathy Madden-Bentle. 7-3-18

Submitter Information

Name: Kathy Madden-Bentle

General Comment

Military weapons have no place in our society, they cause too much harm for a simple misunderstanding. Pump stocks are also an issue for me. Not enough people have the common sense to teach children about gun safety and the responsibility that goes with it. Children are taught to play with guns from a young age, and there is no training or lessons that have been taught to keep children safe. School shootings have become ramped and no one in our government seems to take them seriously enough to protect children while at school, in the store, or elsewhere.

PUBLIC SUBMISSION

As of: 7/13/18 2:13 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-av2s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0649

Public Comment 289. Individual. Raymond Zahra. 7-3-18

Submitter Information

Name: Raymond Zahra

Address:

1555 Horseshoe Dr.

Florissant, MO, 63033

Email: raisemail2000-divert@yahoo.com

Phone: 3142766049

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Regulation of these exports should remain under the jurisdiction of the State Department.

PUBLIC SUBMISSION

As of: 7/13/18 2:14 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-6viy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0650

Public Comment 290. Individual. Julia Stevenson. 7-3-18

Submitter Information

Name: Julia Stevenson

Address:

2955 Albemarle St. NW
Washington, DC, 20008

Email: jks.ei@verizon.net

General Comment

I fervently disagree with the idea of switching the regulation of firearms exports from the State Department to the Commerce Department.

The State Department is the proper entity to handle export licenses of semi-automatic assault weapons and other powerful firearms.

Transferring this authority to the US Commerce Dept would open new floodgates for arms sales internationally, with serious implications for our national security.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Such a move would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I oppose this rule change.

PUBLIC SUBMISSION

As of: 7/13/18 2:16 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-tr0g
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0651

Public Comment 291. Individual. Annie McCombs. 7-3-18

Submitter Information

Name: Annie McCombs

General Comment

I strenuously oppose this proposal to remove control from the Department of State. Abandon this proposal!

PUBLIC SUBMISSION

As of: 7/13/18 2:17 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942q-ixeh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0653

Public Comment 292. Individual. Marian Gompper. 7-3-18

Submitter Information

Name: Marian Gompper

Address:

205 2nd St. NW, Apt. 313
Beulah, ND, 58523

Email: Mariangompper@gmail.com

Phone: 7018734230

General Comment

I am a United States citizen of 84 years, and I am in strong opposition to the transfer of authority over gun sales export from the Department of State to your Department of Commerce. If anything, we need more and tighter restrictions on sales of guns, particularly assault type weapons, especially in these volatile times. Please consider this, as I worry for the future of this nation. I thank you for your consideration.

PUBLIC SUBMISSION

As of: 7/13/18 2:18 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-ppiu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0654

Public Comment 293. Individual. Hazel Pooloa. 7-3-18

Submitter Information

Name: Hazel Pooloa

General Comment

I OPPOSE THIS RULE CHANGE THAT WOULD SWITCH THE REGULATIONS OF FIREARMS EXPORT FROM THE

UNITED STATES STATE DEPARTMENT TO THE UNITED STATES COMMERCE DEPARTMENT. MY FOCUS IS ON

SAFEGUARDING MY UNITED STATES. THE SAFETY OF US AMERICANS--NOT UNETHICAL PROFIT--IS MOST

IMPORTANT.

PUBLIC SUBMISSION

As of: 7/13/18 2:18 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-hb5l
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0655

Public Comment 294. Individual. Pam Palencia. 7-3-18

Submitter Information

Name: Pam Palencia

Address:

3318A Keha Dr.

Kihei, HI, 96753

Email: kachinala@outlook.com

Phone: 808-874-7412

General Comment

I oppose the rule that would switch the regulations of firearms EXPORT to the US Commerce Dept. You might be arming the enemy!!! Think about it.

PUBLIC SUBMISSION

As of: 7/13/18 2:20 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-iwog
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0656

Public Comment 295. Individual. Kathryn Burns. 7-3-18

Submitter Information

Name: Kathryn Burns

Address:

12610 Riata Trace Pkwy
Apt. 1018
Austin, TX, 78727

Email: kathrynburn@gmail.com

Phone: 512-761-3687

General Comment

I wish to object to a proposal to switch oversight of international firearms sales from the State Department to the Commerce Department. First, we're talking about weapons, and we need to be careful who we help to arm in this world. That's always been part of State's mission; Commerce deals with, well, commerce. It's about trade and economics, not protecting human rights -- which could be severely compromised if some of our weapons land in the wrong hands. Commerce just isn't set up to oversee that kind of operation. In addition, certain programs would be eliminated: a.) the State Departments Blue Lantern program, created in 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; b.) oversight of licensing requirements for brokers, increasing the risk of trafficking; c.) the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. All in all, the proposed change would make the world a more dangerous place. Please, please don't allow it to go through.

PUBLIC SUBMISSION

As of: 7/13/18 2:21 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-rgwx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0658

Public Comment 296. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode much of the time. Many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Gun exporters that benefit from these sales should shoulder this cost instead.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.

The rule would eliminate the State Departments Blue Lantern program for publicly reporting gun and ammunition exports. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to deny weapons licenses to violators. End-use controls also are weakened by eliminating registration of firearms exporters.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing

of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument. The new regulations effectively condone and enable 3D printing of firearms around the world. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could cause many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. The State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The rule would eliminate Congressional and public awareness of the total amount of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency whose principle mission is to promote trade. Firearms are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/13/18 2:23 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-4z29
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0659

Public Comment 297. Individual. Joanne Neale. 7-3-18

Submitter Information

Name: Joanne Neale

Address:

44 Dartmouth Ave

Needham Heights, MA, 02494

Email: jmneale@gmail.com

Phone: 7814443553

General Comment

I strongly oppose this rule change which favors the interests of gun manufacturers over the safety of Americans. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/13/18 2:32 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-22wi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0663

Public Comment 298. Individual. Sue VanDerzee. 7-3-18

Submitter Information

Name: Sue VanDerzee

Address:

6B WIGHTMAN PL

CROMWELL, CT, 06416

Email: bvanderzee1234@comcast.net

Phone: 8603490777

Fax: 06416

General Comment

I oppose the rule change that would make arms sales regulated by the Department of Commerce rather than the Department of State, where the responsibility lies now. This seems to me a short-sighted rule change which would make it easier for people around the world to kill each other, and us. When American safety is the buzz word in Washington, DC, why would a rule that makes us less safe even be considered?

PUBLIC SUBMISSION

As of: 7/13/18 2:33 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-rza8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0665

Public Comment 299. Individual. Patrick Bosold. 7-3-18

Submitter Information

Name: Patrick Bosold

General Comment

This rule is a really bad idea.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

All that, just for the sake of increasing sales volume and profits for U.S. weapons manufacturers?

This is terrible public policy, domestically and internationally. Please drop this proposed rule.

PUBLIC SUBMISSION

As of: 7/13/18 2:35 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-nqhh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0666

Public Comment 300. Individual. Sharon Brown. 7-3-18

Submitter Information

Name: Sharon Brown

General Comment

There is enough gun violence in the US to prevent sales here. Why would we wish this on anyone else? Please help the world from becoming a more dangerous place and vote against the sale of military grade weapons to commercial markets. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 2:41 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-8fnk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0672

Public Comment 301. Individual. roger schmidt. 7-3-18

Submitter Information

Name: roger schmidt

Address:

525 N Oneida st # 409

Appleton, WI, 54911

Email: schmidtroger1000@hotmail.com

Phone: 920-358-7418

General Comment

more than a million! more than a million have died since John Lennon was murdered in 1980.it is way way to easy to get a gun! and it is way to easy for anyone with a gun to kill themselves or others when life has been hard for to long or when anger pushes them over there abillity to contain. or when a threat seams to be real, or after a bully beats them or scare them or pushes them in a cornner. or when you get your,re heart broken and sometimes over and over. then maybe you lose someone that was everything to you or more than one. or when you are older and life has not been good to you. or you are disabled and losing hope and your will to live. or when you lose everything that you loved. or when you are sick losing hope. or you come home and find your,re mate with another having sex. you lose your kids or wife or man. when you have lost your hope and feel soooo sad like it just doesn,t matter! THE HURT CAN BE TO THE POINT YOU LOSE CONTROL AND THERE IS A GUN ! YOU ARE NOT THINKING RIGHT AND JUST LIKE THAT BANG ITS OVER!

most that try to kill themself if they live would not do it again! most that have killed would never do it again!

EASY ACCESS TO A THING LIKE A GUN ! MAKES IT WAY WAY TO EASY TO DO THINGS YOU CAN NOT TAKE BACK AT A TIME WHEN YOU ARE NOT THINKING! NO ONE HAS EVERY THING GO RIGHT ALL THE TIME IN LIFE! ANYONE CAN BE PUSHED TO FAR OUR HURT THAT MUCH!

THE GUN MAKES IT WAY TO EASY!

PUBLIC SUBMISSION

As of: 7/13/18 2:43 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-kzfp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0673

Public Comment 302. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: 7/13/18 2:44 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-qocy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0675

Public Comment 303. Individual. Bill Holt. 7-3-18

Submitter Information

Name: Bill Holt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need fewer guns killing people, not more.

PUBLIC SUBMISSION

As of: 7/13/18 2:52 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942q-mbyb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0676

Public Comment 304. Individual. Lesley Boyland. 7-3-18

Submitter Information

Name: Lesley Boyland

General Comment

I am horrified to hear of a proposal to change the rules on the export licenses of semiautomatic assault weapons and other powerful firearms from being handled by the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

I understand that firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Please, put our national security first and decline this alarming proposal.

PUBLIC SUBMISSION

As of: 7/13/18 2:53 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942r-euot Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0677

Public Comment 305. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change. It is simply an attempt to give more profits to gun manufacturers and to expand the right-wing agenda to put guns into the hands of everyone. The Commerce Dept. is not equipped to provide oversight to these sales, and the Congress will not be adequately informed about how many guns are being shipped and where shipments will be sent.

Don't let this rule change go through. It makes everyone, everywhere, less safe.

PUBLIC SUBMISSION

As of: 7/13/18 2:54 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942r-c5e1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0678

Public Comment 306. Individual. Patrick Reid. 7-3-18

Submitter Information

Name: Patrick Reid

General Comment

I strongly oppose switching the regulation of firearms exports from the State Department to the Commerce Department. This misguided change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep weapons out of the hands of bad actors like organized crime and terrorist organizations, and further fuel violence that destabilizes countries

PUBLIC SUBMISSION

As of: 7/13/18 3:00 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942r-tbsh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0679

Public Comment 307. Individual. Arwen Griffith. 7-3-18

Submitter Information

Name: Arwen Griffith

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Commerce should not be the primary driver in gun movement. Safety is much more important.

PUBLIC SUBMISSION

As of: 7/13/18 3:01 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942r-j1ne Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0680

Public Comment 308. Individual. Katherine Howard. 7-3-18

Submitter Information

Name: Katherine Howard

General Comment

I strongly oppose this rule change. Switching the regulation of firearms export from the US State Department to the US Department of Commerce is a bad idea.

PUBLIC SUBMISSION

As of: 7/13/18 3:02 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942r-vvle Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0681

Public Comment 309. Individual. Robert Mutascio. 7-3-18

Submitter Information

Name: Robert Mutascio

Address:

2554 Lincoln Blvd

Venice, CA, 90291-5043

Email: bobm@treeofknowledge.com

General Comment

This BENEFITS NO ONE except for gun manufacturers. And potentially HARMS many people. This is a very bad ruling.

PUBLIC SUBMISSION

As of: 7/13/18 3:03 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942r-iivx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0682

Public Comment 310. Individual. richard smith. 7-3-18

Submitter Information

Name: richard smith

General Comment

Do NOT change the rules by which firearms are sold overseas. They should continue to be sold as military hardware and regulated as they are now by the State Dept., NOT sold as civilian commodities such as clothing or produce. It's bad enough that we have inadequate regulations on firearms sales right here in the U.S.A, but now the firearms mfg. industry led by the NRA want to export our wild west disregard for the lethality of the barely regulated industry. Shame on us.

PUBLIC SUBMISSION

As of: 7/13/18 3:04 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942r-bjk3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0683

Public Comment 311. Individual. Robert Jensen. 7-3-18

Submitter Information

Name: Robert Jensen

Address:

4728 B Lakeshore Ln.S.E.

Lacey, WA, 98513

Email: rvmijensen@hotmail.com

Phone: 3604562228

General Comment

I, Robert Jensen, a citizen of the United States, believe the Second Amendment to the Constitution, limits the right to bear arms to a militia, such as the National Guard, or private, or public police. This amendment was never intended to be used by individuals for self-defense, or killing people. If so, this is contrary to the Ten Commandments of the Bible. The United States has one of the highest number of murders per capita/per year on Earth. Nearly all countries ban the private use of guns.

The recent decision by the United States Supreme Court, allowing guns for self-defense was wrongly decided; and conflicts with prior precedent.

Until this decision is overturned, I am in favor of strict controls, such as: banning assault rifles; automatic, and semi-automatic weapons, and bump stocks; mandatory, and complete background checks; requirement to have standard prior training in the use of guns; and mandatory storage of guns, to prevent the killing of innocent people.

Thank you for this opportunity to comment.

PUBLIC SUBMISSION

As of: 7/13/18 3:16 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942r-vztx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0684

Public Comment 312. Individual. Kevin Crupi. 7-3-18

Submitter Information

Name: Kevin Crupi

General Comment

I oppose this proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

In fact, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Additionally, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. All these represent threats to U.S. national security.

I urge you to oppose this proposed rule change.

PUBLIC SUBMISSION

As of: 7/13/18 3:29 PM
Received: July 03, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-942r-sm6m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0685

Public Comment 313. Anonymous.. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose moving the regulations of firearms export away from the U.S. State Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would make it easier for guns to end up in the hands of those outside of the law like organized crime and terrorist organizations and enemy regimes. It would further fuel violence that destabilizes countries and causes mass migration.

Selling guns outside of the US is NOT business as usual and must be monitored by expertise of the State Dept.

PUBLIC SUBMISSION

As of: 7/13/18 3:30 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942r-9ppi Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0686

Public Comment 314. Individual. Roger Wess. 7-3-18

Submitter Information

Name: Roger Wess

General Comment

The Department of State needs to control the sale of arms out of this country, not the Department of Commerce.

PUBLIC SUBMISSION

As of: 7/13/18 3:30 PM Received: July 03, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-942r-3t3p Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0687

Public Comment 315. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

This seems like a dangerous threat to our national security. I am against changes to this regulation.

PUBLIC SUBMISSION

As of: 7/16/18 9:55 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-1kz3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1071

Public Comment 316. Individual. Henry Lewis. 7-3-18

Submitter Information

Name: Henry Lewis

Address:

266 Society Road
Statesville, NC, 28625

Email: lewishen54@gmail.com

Phone: 7045467141

Fax: 28625

General Comment

As an American teacher and someone who cares deeply about ending random violence and human rights abuses around the world, I firmly OPPOSE the rule change that would move the handling of export licenses for semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Personally, I don't trust American weapons manufacturers to be ethical when it comes to such foreign sales. In addition, the Commerce Department isn't structure to handle proper oversight of such sales.

Making it easier for weapons manufacturers to sell their wares without the oversight of the US Congress is insanity and flies in the face of everything the Trump administration says about trying to keep the Homeland safe from foreign terror and gang threats. Investigations have shown that many of the weapons used in drug and terror related crimes in Latin America (where I'm currently living and teaching) already originate in the USA. Taking away Congress's and the US State Department's oversight of large sales of semi-automatic weapons will only increase the violence in countries where human rights abuses are now common place. This, in turn, will cause more refugees to flee violence-plagued countries and attempt to cross into the USA illegally.

Isn't anyone in Washington, D. C. these days able to use critical thinking skills and connect the dots. The violence always makes it's way back to (and inside) America's borders.

I urge you to reject this rule change!

PUBLIC SUBMISSION

As of: 7/16/18 9:56 AM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-7uka Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1072

Public Comment 317. Individual. Robin Walden. 7-3-18

Submitter Information

Name: Robin Walden

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! It is unthinkable that the US would be considering promoting the sale of assault weapons world-wide.

PUBLIC SUBMISSION

As of: 7/16/18 9:57 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-5a9g
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1073

Public Comment 318. Individual. Cheryl Farmer MD. 7-3-18

Submitter Information

Name: Cheryl Farmer MD

General Comment

Friends, I write in OPPOSITION to a rules change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would facilitate vastly increased sales of arms internationally, with serious implications for our national security. Such a policy could lead to an unfortunate future situation where our own combat troops face troublemakers armed with American made weaponry. This would be an unacceptable outcome! Please maintain the status quo on this issue, as current regulations have been effective for decades.

PUBLIC SUBMISSION

As of: 7/16/18 9:58 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-vvg4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1074

Public Comment 319. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

In regard to human life and the safety of our country we need to keep the sale of all assault weapons and all firearms under the U.S. State Department and not allow it to be transferred to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 9:59 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-ufn1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1075

Public Comment 320. Individual. Peter Mattison. 7-3-18

Submitter Information

Name: Peter Mattison

Address:

13609 Elena Gallegos PL NE
Albuquerque, NM, 87111

Email: pmmattison@gmail.com

Phone: 6179011798

General Comment

I oppose this rule change that would move regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous, and are used daily to kill people globally via organized crime, political violence, and terrorism. Their management is a matter of national security, not business. Don't prioritize the interests of the NRA and gun manufacturers over the safety and well-being of the citizens of this country.

PUBLIC SUBMISSION

As of: 7/16/18 3:02 PM Received: July 03, 2018 Status: Pending_Post Tracking No. 1k2-942r-s9jx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-DRAFT-0756

Public Comment 321. Individual. Kristy Johnson. 7-3-18

Submitter Information

Name: Kristy Johnson

Address:

312 S. Coho Road
Post Falls, ID, 83854

Email: kristyrj@roadrunner.com

Phone: 208-618-9549

General Comment

You have to be kidding me! If there was EVER a time in human history, that the manufacture and sale of firearms & ammunition needs serious oversight, it is now. Tell the NRA NO, not only NO, bur HELL NO!!

PUBLIC SUBMISSION

As of: 7/16/18 10:01 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-8gf2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1076

Public Comment 322. Individual. Linda Carroll. 7-3-18

Submitter Information

Name: Linda Carroll

General Comment

I oppose the transfer of authority over the export of guns from the Department of State to the Department of Commerce. Guns involve many factors that put them out of the realm of simple commerce.

PUBLIC SUBMISSION

As of: 7/16/18 10:02 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-g31a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1077

Public Comment 323. Individual. Peter Reynolds. 7-3-18

Submitter Information

Name: Peter Reynolds

General Comment

I oppose the rules change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rules change benefits the NRA, not American National Security! I oppose it.

PUBLIC SUBMISSION

As of: 7/16/18 10:07 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-q41p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1078

Public Comment 324. Individual. Lari Tiller Howell. 7-3-18

Submitter Information

Name: Lari Tiller Howell

General Comment

I understand that the NRA is pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

I fear that this would be the undoing of civilizing as we know it. At this point in history, with record unrest, human migration and displacement, adding more arms is disaster to the common man. Governments cannot win, peace cannot win, humanity cannot win. Changing the overseeing cabinet depart from the State to the Commerce department can only be for the purpose of selling death.

All it will do is control population growth. ZPG

PUBLIC SUBMISSION

As of: 7/16/18 10:07 AM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-ko17 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1079

Public Comment 325. Individual. Pamela LaRue. 7-3-18

Submitter Information

Name: Pamela LaRue

Address:

3703 Hackett Ave
Long Beach, CA, 90808

Email: pkayelarue@aol.com

Phone: 5624293094

Fax: 90808

General Comment

For national security reasons, control and approval of arms sales abroad must remain under the purview of the Department of State.

PUBLIC SUBMISSION

As of: 7/16/18 10:08 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-kg60
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1080

Public Comment 326. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The US State Department is better equipped to keep in mind the security of the USA.

PUBLIC SUBMISSION

As of: 7/16/18 10:09 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-mv0z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1081

Public Comment 327. Individual. Hildy Feen. 7-3-18

Submitter Information

Name: Hildy Feen

General Comment

I strongly oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Below are more reasons why the proposed rule change should not be approved:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

It would impact our national security by facilitating firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fueling violence that destabilizes countries and causes mass migration.

The world needs less firearms, not more.

Humanity needs less killing, not more.

PUBLIC SUBMISSION

As of: 7/16/18 10:10 AM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-dfdq Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1082

Public Comment 328. Individual. C. Warren Pope. 7-3-18

Submitter Information

Name: C. Warren Pope

Address:

Asheville, NC, 28803

Email: cdubski@yahoo.com

Phone: 8286878977

General Comment

This relaxation in export rules for firearms is ridiculous and must be defeated. More guns means more death and more murders. Don't we have enough trouble in the US?

PUBLIC SUBMISSION

As of: 7/16/18 10:11 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-5k0o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1083

Public Comment 329. Individual. Allan Campbell. 7-3-18

Submitter Information

Name: Allan Campbell

General Comment

I oppose this rule because it would allow more firearms. Because the regulations should not be changed to the Commerce department.

PUBLIC SUBMISSION

As of: 7/16/18 10:12 AM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-pvkb Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1084

Public Comment 330. Individual. Mary Steele. 7-3-18

Submitter Information

Name: Mary Steele

Address:

24561 La Hermosa

Laguna Niguel, CA, 92677

Email: online-activist@alumni.stanford.edu

Phone: 555-555-5555

General Comment

This proposed rule change would make the world a far more dangerous place: and
It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
It would remove licensing requirements for brokers, increasing the risk of trafficking.
It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

Who is to say that the increased gun shipments to foreign countries wouldn't be used against our country, decreasing our national security. The rule change's only purpose is to enhance the profit of the gun manufacturers.

PUBLIC SUBMISSION

As of: 7/16/18 10:13 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-7g14
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1085

Public Comment 331. Individual. James Roberts. 7-3-18

Submitter Information

Name: James Roberts

Address:

3436a Granada Ave

Dallas, TX, 75205

Email: Jsr72748@gmail.com

Phone: 2148372465

General Comment

Recently proposed, suggestion is a tragedy to humankind- expanding USAs reputation as merchant of death to civilians. Bad enough America is already known for it in military weapons.

Gun manufactures, NRA and others are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Everything coming out of this administration- coal to soybeans, to auto parts, to steel is labeled national security when true be told its corporate socialism and another white collar federally funded jobs program.

Export of weapons (all types, make, model, purpose) need to remain with State department not commerce.

PUBLIC SUBMISSION

As of: 7/16/18 10:13 AM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-3jxd Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1086

Public Comment 332. Individual. Andrea Hicklin. 7-3-18

Submitter Information

Name: Andrea Hicklin

General Comment

The suggestion to move international gun sales away from the State department's control is painfully, ludicrously, dramatically, and objectively a TERRIBLE idea. We would no longer have any knowledge of weaponry sold to our enemies in terrorist organizations. It would make our country LESS safe. This is arguably the stupidest idea I've ever heard.

PUBLIC SUBMISSION

As of: 7/16/18 10:14 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-39i6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1087

Public Comment 333. Individual. Jody Benson. 7-3-18

Submitter Information

Name: Jody Benson

Address:

3547 Pueblo Dr

Los Alamos, NM, 87544

Email: echidnaejb@gmail.com

Phone: 505-662-4782

General Comment

As a gun owner, former hunter, and former ARCAO (Korea: Camp Henry, Camp Humphries, Camp Casey 71/72 when these bases were primitive), I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I do not want weapons in the hands of terrorists and criminals in other countries that can be used, not only against their own people, but against Americans abroad.

Ive travelled the world and been in many conflict zones, including Afghanistan. The lawlessness of these areas is exacerbated by the fact that everybody owns a weapon. Small arms and light weapons are the preferred weapon of these small-time bullies, drug dealers, and cartels, as well as big-time terrorists like ISIS, al-Qaeda, al-Shabaab, Boko Haram.

Making light weapons (the definition includes: revolvers and self-loading pistols, rifles and carbines, assault rifles, sub-machine guns and light machine guns) available as a commodity anybody can order without any restrictions over the internet, makes it easy for small arms dealers to buy and resell these weapons, the favorites of terrorists, criminals, and drug dealers. We dont want American criminals to have these weapons. Lets not loose them on innocent civilians around the world. Say no to any loosening of any restrictions of exporting weapons. Dont be tone deaf to American values. Americans dont want more foreign threats, any more than we want more communities disrupted by gun violence. Make it harder for these terrorists to get guns, not easier. Keep cheap guns out of the hands of these bullies. Keep American government workers, international corporate workers, and tourists safe from criminals. People over profit.

PUBLIC SUBMISSION

As of: 7/16/18 10:15 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-85wf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1088

Public Comment 334. Individual. Rinya Frisbie. 7-3-18

Submitter Information

Name: Rinya Frisbie

Address:

1539 NE Laurelwood circle
Canby, OR, 97013

Email: jimandrinya@canby.com

Phone: 5032669100

General Comment

I am strongly opposed to the proposed rule change that would transfer the oversight of non-military firearms exports from the State Department to the Commerce Department. The proposed rule is supported by the NRA and the only purpose is to increase the profits for the US gun industry--one that loosing support in the USA. The only entity that is requesting this change is the gun lobby and it expects this change will increase firearms exports by 20%. This will put more guns in the hands of terrorists around the world. It is even more dangerous because it moves supervision and oversize to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more; this makes no sense. This seems like one more attempt to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have killed too many civilians already. Please do not approve this blatant corporate giveaway. The world does not need more instruments of mass killing--only the gun lobby would think this is a good idea. We the people are watching as you make these decisions. Please make them wisely as you will be accountable.

PUBLIC SUBMISSION

As of: 7/16/18 10:16 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-8y5f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1089

Public Comment 335. Individual. Susan Briggs. 7-3-18

Submitter Information

Name: Susan Briggs

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule would also remove the State Departments block on the 3D printing of firearms, made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/16/18 10:17 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-d3wc
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1090

Public Comment 336. Individual. Megan Condit-Chadwick. 7-3-18

Submitter Information

Name: Megan Condit-Chadwick

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress needs oversight of arms sales in order to ensure that the U.S. is not arming countries with human rights violations and those that may threaten our national security. The ban on 3D printing of weapons needs to stay in place. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 10:18 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-8swm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1091

Public Comment 337. Individual. Frank Hannwacker. 7-3-18

Submitter Information

Name: Frank Hannwacker

General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U. S. State Dept to the
U.S Commerce Dept

PUBLIC SUBMISSION

As of: 7/16/18 10:19 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-65py
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1092

Public Comment 338. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It is unwise to increase access to these weapons domestically or internationally. I very much oppose this rule change, as it would do much more harm than good.

PUBLIC SUBMISSION

As of: 7/16/18 10:20 AM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-t4ku
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1093

Public Comment 339. Anonymous. 7-3-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Here are details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

It would totally nullify the ability of the US to keep from arming dangerous foreign nationals, thereby making attacks on US soil far more likely.

This stupid idea to enrich the already rich arms dealers boggles the imagination!

PUBLIC SUBMISSION

As of: 7/16/18 2:21 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-65vf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1203

Public comment 340. Individual. Elizabeth Bartlett-7-6-18

Submitter Information

Name: Elizabeth Bartlett

General Comment

I strenuously object to any action of my government that makes the distribution of military style weapons - or for that matter ANY weapons - easier than it currently is. Our nation does not need to be exporting the violence that our gun culture causes here to infest other nations. The current proposal to shift control to the Commerce Department blatantly prioritizes gun dealer and manufacturer profit over civilization and safety.

The current proposal:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

I do not want my country to stand before the world as preferring money to human rights!

PUBLIC SUBMISSION

As of: 7/16/18 2:20 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944k-4axd Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1202

Public comment 341. Individual. Mae Harms. 7-6-18

Submitter Information

Name: Mae Harms

Address:

5941 Garden Park Drive

Garden Valley, CA, 95633

Email: maeharms76@hotmail.com

General Comment

The firearms in the USA need to be controlled so that people with mental illness or raging tempers do not have easy access to them and maim and kill innocent people.

PUBLIC SUBMISSION

As of: 7/16/18 2:18 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-gw38
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1201

Public comment 342. Individual. Bill Holt. 7-6-18

Submitter Information

Name: Bill Holt

General Comment

Do not allow the export of more firearms. The world is already bleeding from US made firearms.

PUBLIC SUBMISSION

As of: 7/16/18 2:17 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-q3fs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1200

Public comment 343. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose the proposed rule change. It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. In addition, it eliminates Congressional oversight for important gun export deals and transfers the cost of processing licenses from gun manufacturers to taxpayers.

The Commerce Department does not have the resources to enforce export controls, even now, and this proposed rule change would transfer gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. (!)

Please do not approve this rule change. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 2:16 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-rxhb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1199

Public comment 344. Individual. Elizabeth Hjelmseth. 7-6-18

Submitter Information

Name: Elizabeth Hjelmseth

Address:

24 Holly View Way
Bellingham, WA, 98229

Email: elhjelmseth@gmail.com

Phone: 3603039504

General Comment

I strongly oppose moving gun control to the commerce department. In a world filled with evil people who are more than willing to do harm to the US it is imperative that we control which players have access to small munitions.

PUBLIC SUBMISSION

As of: 7/16/18 2:15 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-2ei3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1198

Public comment 345. Individual. Donna Schmidt. 7-6-18

Submitter Information

Name: Donna Schmidt

Address:

3131 Glengold Dr

Farmers Branch, TX, 75234

Email: bandman01@sbcglobal.net

Phone: +9723100755

General Comment

I could not be more vehemently opposed to this!! Making it easier for people around the world to have dangerous weapons is, at the least, counterintuitive!! We are already suffering from our mistakes with guns being trafficked to Mexico and Latin America, resulting in the migration of those seeking asylum in the U.S. to escape the violence of gangs and cartels. Let's learn from these and other mistakes, such as arming the Afghans many years ago!

PUBLIC SUBMISSION

As of: 7/16/18 2:14 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-qz1i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1197

Public comment 346. Individual. Lynne Walter, MSW. 7-6-18

Submitter Information

Name: Lynne Walter, MSW

General Comment

I STRONGLY oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department! This switch makes absolutely no sense, will only increase gun violence in the United States, and reeks of favoritism towards the NRA.

PUBLIC SUBMISSION

As of: 7/16/18 2:12 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-uf0k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1196

Public comment 347. Individual. Terri Cole. 7-6-18

Submitter Information

Name: Terri Cole

Address: United States,

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns should not be about commerce and profits!

PUBLIC SUBMISSION

As of: 7/16/18 2:11 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-blce
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1195

Public comment 348. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S.

Commerce Department. This will just allow more guns to be sold to countries that we have no way of knowing where they will eventually end up.

PUBLIC SUBMISSION

As of: 7/16/18 2:10 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-q06i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1194

Public comment 349. Individual. Erin Reed. 7-6-18

Submitter Information

Name: Erin Reed

General Comment

I am absolutely against this. This is a complete threat to national security. DO NOT allow this to happen

PUBLIC SUBMISSION

As of: 7/16/18 2:06 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944k-yhdk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1193

Public comment 350. Individual. Linda Morgan. 7-6-18

Submitter Information

Name: Linda Morgan

Address:

P.O. Box 377406

Ocean View, HI, 96737

Email: lindainhawaii65@gmail.com

Phone: 8087852058

General Comment

I oppose this rule change! It's unacceptable and horrible to have so much gun violence in America. We definitely should not make it easier to export guns and increase gun violence throughout the world.

PUBLIC SUBMISSION

As of: 7/16/18 2:04 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-643u
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1192

Public comment 351. Individual. Inge Johnsson. 7-6-18

Submitter Information

Name: Inge Johnsson

Address:

6020 Van Horn Ln
Frisco, TX, 75034

Email: contact@ingejohnsson.com

Phone: 4254959241

Fax: 75034

General Comment

I am very concerned about the proposed change to easier to spread murder weapons legally across the world, just because the gun industry wants to make more profit. This is not in our interest as a nation, to be complicit in increasing homicide rates abroad. Some of the reasons to not approve this proposed rule change are:

- 1) Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2) Eliminates Congressional oversight for important gun export deals.
- 3) Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4) Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5) Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6) Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7) The Commerce Department does not have the resources to enforce export controls, even now.
- 8) Reduces transparency and reporting on gun exports.
- 9) Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Thanks for this opportunity to share my views as a citizen and voter, and to allow me to express my desire to

make the world a safer place, not one where firearms end the lives of thousands every year.

PUBLIC SUBMISSION

As of: 7/16/18 2:03 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-wfaa
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1191

Public comment 352. Individual. Judith Weeks. 7-6-18

Submitter Information

Name: Judith Weeks

General Comment

I strongly OPPOSE switching the regulation of firearms exports from the State Department to the Department of Commerce. It would remove the State Department's ability to restrict 3D printing of weapons and open the floodgates for more weapons domestically and internationally; It would remove licensing requirements for brokers; and it would stop the program that inspects pre-license guns and issues reports. Without the State Department oversight and regulatory authority, firearms will be exported to anyone with money and contribute to organized crime and terrorism.

There is NO need to switch control of the export of firearms unless it is to pay for firearms lobbyists. This is just another ruse by the NRA to gain more control and have less oversight into their actions. PLEASE DO NOT APPROVE THIS MOVE.

Sincerely, a concerned citizen

Judith Weeks

Morrison, CO

PUBLIC SUBMISSION

As of: 7/16/18 2:02 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-3b6h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1190

Public comment 353. Individual. James Waddell. 7-6-18

Submitter Information

Name: James Waddell

Address:

7806 SW Village Greens Circle
Wilsonville, OR, 97070

Email: jmwaddell03@yahoo.com

Phone: 5036948085

General Comment

All Firearms in this Country need to be CONTROLLED!

PUBLIC SUBMISSION

As of: 7/16/18 2:01 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-xdvw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1189

Public comment 354. Individual. Arnold Haber. 7-6-18

Submitter Information

Name: Arnold Haber

Address:

4800 Steiner Ranch Blvd.

Austin, TX, 78732

Email: arne@arnoldhaber.com

Fax: 78732

General Comment

Continue warrant control

PUBLIC SUBMISSION

As of: 7/16/18 1:59 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-6buc Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1188

Public comment 355. Individual. Meghan E. 7-6-18

Submitter Information

Name: Meghan E

Address:

[Select A State], 06053

Email: meghane2006@gmail.com

General Comment

Keep guns off the streets. Countries like Australia and Japan have banned the sales of guns and have almost no gun crime. Gun violence is a terrible American epidemic. We can prevent everyday gun deaths. Let's start now.

PUBLIC SUBMISSION

As of: 7/16/18 1:58 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-qz0a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1187

Public comment 356. Individual. Lauren Wade. 7-6-18

Submitter Information

Name: Lauren Wade

Address:

210 McPherson Ave

Ironton, OH, 45638-1116

Email: lwade5309@gmail.com

Phone: 7406469558

General Comment

I Am Strongly Opposing This Idea With Guns. We Need Stronger Gun Laws That Will Help With Domestic Violence And School Safety

PUBLIC SUBMISSION

As of: 7/16/18 1:56 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-eucp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1186

Public comment 357. Individual. Dave Frank. 7-6-18

Submitter Information

Name: Dave Frank

General Comment

People want common sense gun regulations.

PUBLIC SUBMISSION

As of: 7/16/18 1:55 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-9n33
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1185

Public comment 358. Individual. Barbara Caiola. 7-6-18

Submitter Information

Name: Barbara Caiola

General Comment

Impose safer background availability. Just do the right thing.

PUBLIC SUBMISSION

As of: 7/16/18 1:54 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-6oeh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1184

Public comment 359. Individual. Gina Bates. 7-6-18

Submitter Information

Name: Gina Bates

Address:

40 South St

Apple Creek, OH, 44606

Email: star3609@aol.com

Phone: 3306986195

General Comment

I STRONGLY OPPOSE this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!

This must be BLOCKED. Keep the CURRENT rules in place.

PUBLIC SUBMISSION

As of: 7/16/18 1:50 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-9ifd Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1183

Public comment 360. Individual. Robert Stewart. 7-6-18

Submitter Information

Name: Robert Stewart

Address:

13576 Melville Lane
Chantilly, 20151-2492

Email: grobertstewart1@mac.com

Phone: 7038190479

General Comment

Background checks of all gun purchases should be mandatory, a sine qua non. Also, all assault type weapons should be banned.

PUBLIC SUBMISSION

As of: 7/16/18 1:49 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-gcyt Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1182

Public comment 361. Individual. Michael Downs. 7-6-18

Submitter Information

Name: Michael Downs

General Comment

NO more guns! Ban assault rifles, the only people who need them are US Military!

PUBLIC SUBMISSION

As of: 7/16/18 1:48 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-50jm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1181

Public comment 362. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

The refugees worldwide fleeing war know that fewer arms make them safer.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 1:46 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-ecmw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1180

Public comment 363. Individual. Kate Darrigo. 7-6-18

Submitter Information

Name: Kate Darrigo

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for this rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Once again, I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Thank you for your attention to this important matter.

PUBLIC SUBMISSION

As of: 7/16/18 1:45 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-w3v8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1179

Public comment 364. R. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Greetings,

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Best,
R

PUBLIC SUBMISSION

As of: 7/16/18 1:42 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-8s0k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1178

Public comment 365. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

In a free capitalist society companies have and do lobby aggressively for total unregulated ability to sell their wares inside and outside the country. Most products that are likely to cause danger to others or to consumers are highly regulated and rightly so like automobiles, medicines and even foods. This protection of the American and world consumer is inherent to the U. S. capitalist core. One exception is guns. Why?

Reasons abound. The point though is about the legality and morality of both selling internally and exporting to the world without logical restrictions of highly dangerous guns and war-caliber weapons to regular citizens in the name of a companys right. What about the right to protect consumers, families and communities? The government has both the economic and moral obligation to protect consumers and all citizens. The recent past legislation expired in the late 1980s that prohibited the sale of automatic and other war-calibre weapons to regular citizens inside and outside the U. S. was a bi-partisan agreement, totally in line with the U. S. Constitution. It is not a coincidence that violence in the last 20+ years has dramatically increased both in the U. S. and is currently ravaging neighboring countries. Unfortunately, this tragedy is largely caused by U. S. supplied and free-flowing arms that have no reason to be in the hands of law abiding citizens and even less reason to be accessible to dubious groups. Governments law enforcing forces are overextended and are often part of the many victims high-powered guns enable. A safety-driven and regulated gun industry is otherwise feasible.

Exporting the U. S. phoneme of mass shootings (it does not happen around the world; only with recent terrorist groups), increased brutality facilitated by easy availability of guns that should only be allowed in case of war, higher risks of gun-assisted suicides and rising youth violent behavior are against every Americans safety. Expanding a market of death and violence by U. S. companies does not make any sense.

Restate previous limits for starters. Show what American capitalism is really all about, growing wealth and prosperity peacefully. Regulation of danger is part of this.

PUBLIC SUBMISSION

As of: 7/16/18 1:41 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-muhk Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1177

Public comment 366. Individual. Denese Edsall. 7-6-18

Submitter Information

Name: Denese Edsall

Address:

1625 N 58 Ave

Hollywood, FL, 33021

Email: dened62431@bellsouth.net

Phone: 954-242-1015

General Comment

I oppose this rule change moving the regulation of firearms exports from the US State Department to the US Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 1:40 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-fodx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1176

Public comment 367. Individual. Dennis Young. 7-6-18

Submitter Information

Name: Dennis Young

General Comment

We need less guns, not more!

PUBLIC SUBMISSION

As of: 7/16/18 1:39 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-cdqq Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1175

Public comment 368. Individual. Paul Gray. 7-6-18

Submitter Information

Name: Paul Gray

Address:

659 Harbor Edge Circle, #102
Memphis, TN, 38103

Email: paul8045@gmail.com

Phone: 9013553604

General Comment

Whether intentional, or not too many people wind up dead. We are better off without guns!

PUBLIC SUBMISSION

As of: 7/16/18 1:38 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-m16v
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1174

Public comment 369. Individual. Rick Galliher. 7-6-18

Submitter Information

Name: Rick Galliher

General Comment

I oppose the transfer of authority over gun sales from the State Dept to the idiots at the Commerce dept. I do NOT want guns being sold to people that may use them to harm Americans or our allies.

This is a greedy mindless money grab and should be opposed by all patriotic people.

PUBLIC SUBMISSION

As of: 7/16/18 1:33 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-d5af Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1173

Public comment 370. Individual. Stephen Melott. 7-6-18

Submitter Information

Name: Stephen Melott

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. We must STOP the opening of new floodgates for gun sales!

PUBLIC SUBMISSION

As of: 7/16/18 1:32 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-8keh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1172

Public comment 371. Individual. Sonia ImMasche. 7-6-18

Submitter Information

Name: Sonia ImMasche

General Comment

This change is nuts! The President is pandering to a few and leaving the rest of us at risk! I am not in support of this regulations change.

PUBLIC SUBMISSION

As of: 7/16/18 1:30 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-eywj Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1171

Public comment 372. Individual. Henry Paradis. 7-6-18

Submitter Information

Name: HENRY PARADIS

General Comment

Only arms meant to hunt animals, or hand guns should be sold after an extensive background check is made, and a week waiting period.

PUBLIC SUBMISSION

As of: 7/16/18 1:29 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-k7ww Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1170

Public comment 373. Individual. Patrick Hinton. 7-6-18

Submitter Information

Name: Patrick Hinton

Address:

32504 Sunburst Lane
Evergreen, CO, 80439

General Comment

The US Commerce Department should not oversee the sale of semi automatic weapons exported around the globe. This oversight should be the responsibility of the State Department.

PUBLIC SUBMISSION

As of: 7/16/18 1:28 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-t5ds Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1169

Public comment 374. Individual. Stephanie Bair. 7-6-18

Submitter Information

Name: Stephanie Bair

General Comment

The control of sales and shipment of fire arms and weapons made in the US should be closely governed within and without the USA. No shipments of US weapons should go out of the US to any foreign countries unless they are US allies. Then shipments should be guarded by US soldiers until placed in the hands of allies.

PUBLIC SUBMISSION

As of: 7/16/18 1:26 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-5tew
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1168

Public comment 375. Individual. Laurie Doscher. 7-6-18

Submitter Information

Name: Laurie Doscher

Address: United States,

Email: ldoscher@earthlink.net

Phone: 541 935 4324

General Comment

I oppose this rule change. I don't trust Mr. Trump's influences or decisions.

PUBLIC SUBMISSION

As of: 7/16/18 1:24 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-7gvp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1167

Public comment 376. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

Address:

108 Eliseo Drive

Greenbrae, CA, 94904

Email: joanesq93@gmail.com

Phone: 4152345678

General Comment

Do not change the rules for sale of weapons in any way that increases the sales of firearms either domestically or internationally. We need to protect people from guns, not encourage carnage and destruction.

PUBLIC SUBMISSION

As of: 7/16/18 1:17 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-b6ko
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1166

Public comment 377. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department, which is focused on safeguarding our nation, to the U.S. Commerce Department, which promotes American business. This transfer of authority and oversight will increase arms sales internationally and have serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/16/18 1:16 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-syc4 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1165

Public comment 378. Individual. Elliot Pliner. 7-6-18

Submitter Information

Name: ELLIOT PLINER

Address:

new york, NY, 10011

Email: epliner@epliner.com

Phone: 2125358887

General Comment

DO NOT PERMIT THE CHANGE OF EXPORT LICENSES FOR ASSAULT WEAPONS FROM THE STATE DEPARTMENT TO THE COMMERCE DEPARTMENT.

PUBLIC SUBMISSION

As of: 7/16/18 1:15 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-rtle Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1164

Public comment 379. Individual. Tod Boyer. 7-6-18

Submitter Information

Name: Tod Boyer

General Comment

No subverting of gun sales regulations!

PUBLIC SUBMISSION

As of: 7/16/18 1:14 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-ud9r
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1163

Public comment 380. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

This stupid idea will put the United States at risk from outsiders that have bought guns from unscrupulous dealers that only have their bottom line in mind. The State department can at least control what and where munitions are sold - preferably NOT TO OUR ENEMIES inside our country or outside our country.

PUBLIC SUBMISSION

As of: 7/16/18 1:13 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-zaey
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1162

Public comment 381. Individual. Mary Anglin. 7-6-18

Submitter Information

Name: Mary Anglin

General Comment

I cannot believe we are actually seriously proposing allowing unfettered export of guns from the U.S. to anywhere in the world --- are you insane? Isn't the world already dangerous enough, to everyone, including our own citizens traveling abroad or serving in our armed forces. Please, please do not allow this change.

PUBLIC SUBMISSION

As of: 7/16/18 1:12 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-kqqi Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1161

Public comment 382. Individual. Greta Aul. 7-6-18

Submitter Information

Name: greta Aul

General Comment

What we allow in the USA in terms of guns and gun parts which can kill multiple people should never be allowed here or anywhere. This is sounding like the shift of cigarette advertising to other countries when tobacco industries were forced to put labeling on cigarette packs the US indicating that cigarettes are dangerous to peoples' health. Let's sell these guns and gun parts to other countries, and start doing so right away, before they are banned in America. What a fantastic way to keep gun manufacturers in business! Then we really will have to carefully monitor people coming to America! Hopefully the reader of this letter can see the sarcasm...

PUBLIC SUBMISSION

As of: 7/16/18 1:10 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-oztw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1160

Public comment 383. Individual. Kathryn Burns. 7-6-18

Submitter Information

Name: Kathryn Burns

General Comment

Contrary to what the NRA may have told you, the world does NOT need more firearms. Enough already! We've got enough blood on our hands as it is.

PUBLIC SUBMISSION

As of: 7/16/18 1:09 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-o2sf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1159

Public comment 384. Individual. Nina Liakos. 7-6-18

Submitter Information

Name: Nina Liakos

Address:

811 Jonker Court

Gaithersburg, MD, 20878

Email: nina.liakos@gmail.com

Phone: 2402461789

Fax: 20878

Organization: Moms Rising

General Comment

I fiercely oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security, to say nothing of the security of people in other countries where these guns would end up. The United States, historically the protector of human rights and supporter of democracy worldwide, must never become the purveyor of death to people around the world. We would be vilified forever if this were to happen.

PUBLIC SUBMISSION

As of: 7/16/18 1:08 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-p3hu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1158

Public comment 385. Individual. William Hilliker. 7-6-18

Submitter Information

Name: William Hilliker

General Comment

I oppose this rule change that would switch gun sales supervision from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 1:07 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-u3jz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1157

Public comment 386. Individual. Bruce Cole. 7-6-18

Submitter Information

Name: Bruce Cole

Address:

111 Griffin Ave
Hampden, 04444

Email: rx7fb@hotmail.com

General Comment

I wish to object to any regulatory change that increases the health and safety of humans anywhere. Our injury and death statistics related to firearms incidents dwarfs that of the rest of the civilized world. We do not need to export that kind of risk elsewhere. Profiting from this would benefit a very few compared to the potential harm to others. And it is likely some of these weapons could be used on Americans. Please refuse this regulation change. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 1:06 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-9pgp Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1156

Public comment 387. Individual. Michael Tucker. 7-6-18

Submitter Information

Name: michael tucker

General Comment

This is a very bad idea.

PUBLIC SUBMISSION

As of: 7/16/18 1:04 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-c6vk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1155

Public comment 388. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

We need national, sensible gun control laws!!! Every single day I hear on the news about multiple people who have been shot to death and it is outrageous!!!!

PUBLIC SUBMISSION

As of: 7/16/18 1:03 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-yjj1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1154

Public comment 389. Individual. Myra Dewhurst. 7-6-18

Submitter Information

Name: Myra Dewhurst

General Comment

The ability of the NRA to enact legislation that goes against the wishes of 80%-90% of the population is disturbing and frightening. Politicians that are complicit in passing legislation that goes against their own constituents are acting as profiles in cowardice and should be called out repeatedly, by name, on this issue. The NRA is responsible for more deaths in the United States than any terrorists groups and should be shamed accordingly. The idea that the NRA now wants to export their gun madness and arm our potential enemies is pure insanity. We must organize and vote the NRA politicians out of office. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 12:58 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-drr9 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1153

Public comment 390. Individual. Nancy Fowlie. 7-6-18

Submitter Information

Name: Nancy Fowlie

General Comment

Any and all guns and ammunitions need to be regulated at all times by the federal and state governments. We must as a nation of laws protect all our citizens. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 1:01 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-a7qp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1152

Public comment 391. Individual. Stephanie Hagiwara. 7-6-18

Submitter Information

Name: Stephanie Hagiwara

General Comment

Safety first. We need to take action to keep our citizens and the citizens of the World safe. Having the U.S. State Department handle the export licenses of semiautomatic assault weapons and other powerful weapons would keep safety first as the top criteria. The U.S. Commerce Departments first priority is increasing sales. Who knows how far safety would be pushed down the list. It is in our best interest to continue to have the U.S. State Department handle export licenses.

PUBLIC SUBMISSION

As of: 7/16/18 12:51 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-9dd3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1151

Public comment 392. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Moving any regulations of assault/military, and large capacity weapons needs time for review. It is obvious that a commercial agency would lean towards looser regulations to promote business. The NRA already has too much to say in terms off what determines "public safety" . Each new shooting is a testament to that useless viewpoint. Dead is dead-"prayers and sympathy do NOT REPLACE LOST family members. The President and his 1% money grubbing team are ONLY interested in 1 thing- guns everywhere- with little restrictions. Let's really look into who would benefit dollar wise-it should be an interesting fact finding mission.

PUBLIC SUBMISSION

As of: 7/16/18 12:50 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-q5v2 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1150

Public comment 393. Individual. Dorothy Miller. 7-6-18

Submitter Information

Name: Dorothy Miller

General Comment

Stop the increase and availability of fire arms

PUBLIC SUBMISSION

As of: 7/16/18 12:49 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-khh1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1149

Public comment 394. Individual. Beverly Barry. 7-6-18

Submitter Information

Name: Beverly Barry

Address:

2710 Avalon St

Jefferson, 70121

Email: beverlybarry@att.net

Phone: 5048378072

General Comment

I oppose any effort to move the transfer of firearms for sale from the State Dept. to the Commerce Dept. This is obviously a move to allow firearms, dangerous automatic weapons, and ammunition for sale to other countries including those that may not have favorable relationships with the USA. This could pose a serious threat to National Security.

PUBLIC SUBMISSION

As of: 7/16/18 12:48 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-s1mw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1148

Public comment 395. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

We already are the 2nd largest munitions exporter in the world. These weapons are not sold to good guys but to terrorists, drug smugglers, and militias that destabilize the existing order in many countries. This contribution to human suffering must be ratcheted back, not increased!

PUBLIC SUBMISSION

As of: 7/16/18 12:47 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-hgyn Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1147

Public comment 396. Individual. Susan Peterson. 7-6-18

Submitter Information

Name: Susan Peterson

General Comment

All we need is more dead kids and innocent adults due to this country's asinine gun laws.....

PUBLIC SUBMISSION

As of: 7/16/18 12:46 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-j0pr Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1146

Public comment 397. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this nonsensical and dangerous rule change!!!!

PUBLIC SUBMISSION

As of: 7/16/18 12:45 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-21ke Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1145

Public comment 398. Individual. Richard Guevara. 7-6-18

Submitter Information

Name: Richard Guevara

Address:

3540 Willow Dr. Apt. 67

Plover, WI, 54467

Email: rcbb817@aol.com

Phone: 5204838808

General Comment

I oppose any changes in regards to placing control of firearms, guns, ammunition, and related articles, to any other agency from the agency overseeing them currently.

PUBLIC SUBMISSION

As of: 7/16/18 12:44 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-x09i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1144

Public comment 399. Individual. Lawrence Jacksina. 7-6-18

Submitter Information

Name: Lawrence Jacksina

Address:

1238 Timberbranch Ct.

Charlottesville, VA, 22902

Email: 9bitte@embarqmail.com

Phone: 4349793989

General Comment

So now we live with the possibility of ANYONE being armed and carrying in concealment., Where do the founders suggest that this is what they expected for us? Why do we NEED to live like this? How do we do well towards others when others may want to do ill towards us? Who wins under these circumstances? Weapons manufacturers, NRA, politicians who receive donations from the gun lobby, morticians, etc. We NEED to live peacefully. More guns havent made us safer, and never will. This world of ours would be under constant siege with unregulated weapons.

THINK ABOUT IT! Then dont allow the sale of our peace, our security and our lives for the profit of the few. Find your soul, find love of life and humanity.

PUBLIC SUBMISSION

As of: 7/16/18 12:28 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-343m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1143

Public comment 400. Individual. Sa Meyers. 7-6-18

Submitter Information

Name: Sa Meyers

Address:

367 E 11th Street

Upland, CA, 91786

Email: satiny33717@mypacks.net

Fax: 91786

General Comment

I oppose the firearms rule change that would switch regulations to the US department of commerce. This would lead to making gun sales more difficult to trace and more obscure.

PUBLIC SUBMISSION

As of: 7/16/18 12:27 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-6h76 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1142

Public comment 401. Individual. Jo Ann McGreevy. 7-6-18

Submitter Information

Name: Jo Ann McGreevy

Address:

9060 Palisade

926

North Bergen, 07047

Email: joann.mcgreevy@nyu.edu

Phone: 2015908440

General Comment

1000% WRONG! This is simply another very stupid "act" on the part of Trump!

PUBLIC SUBMISSION

As of: 7/16/18 12:26 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-ntjw Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1141

Public comment 402. Individual. Richard Schoenberger. 7-6-18

Submitter Information

Name: Richard Schoenberger

Address:

4601 E. Fanfol Dr.
Phoenix, AZ, 85028

Email: TNA1000@AOL.COM

Phone: 4804049691

General Comment

I oppose this, it is absurd to think that MORE access to guns will lead to less violence.

PUBLIC SUBMISSION

As of: 7/16/18 12:25 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-6opa Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1140

Public comment 403. Individual. Nancy Brown. 7-6-18

Submitter Information

Name: Nancy Brown

Address:

502 Hampton Dr
King, 27021

Email: KATZ10@Windstream.net

Phone: 3369834047

Fax: 27021

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U. S. State Department to the U. S. Commerce Department. I think this would be a very unwise decision. It could in the future result in difficulties for our soldiers against revolutionaries and gangs in foreign actions among other things.

Thank you for your time and attention.

Sincerely,

Mrs. Nancy Brown

PUBLIC SUBMISSION

As of: 7/16/18 12:24 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-jsu8 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1139

Public comment 404. Individual. Ann Berndt. 7-6-18

Submitter Information

Name: Ann Berndt

General Comment

It is vitally important to control the sale of firearms, guns, and ammunition. Gun sales should be restricted. Gun control is absolutely necessary to curtail the violence that abounds here and in no other civilized society.

PUBLIC SUBMISSION

As of: 7/16/18 12:22 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-rg9d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1138

Public comment 405. Individual. Nancy Cadet. 7-6-18

Submitter Information

Name: Nancy Cadet

Address:

4 Sammys beach road

East Hampton, NY, 11937

Email: Cadetinpanama@gmail.com

General Comment

I do not support the proposed BIS rule for the control of firearms, guns ammunition and related articles. We need more stringent controls on the export of weapons, not fewer!
We should further restrict the movement of weapons and ammunition by all legal means.
We also need laws and procedures to register and trace all weapons that are sold in the domestic market.
The incredible rate of homicide and suicide by firearm is linked to easy access in the US.

We know US guns also flood neighboring countries , such as the weapons fueling armed violence in Mexico. In fact, most of the guns used by Mexican drug cartels come from the US due to our lax gun laws.

PUBLIC SUBMISSION

As of: 7/16/18 12:20 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-piu9 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1137

Public comment 406. Individual. Mimi Hodsoll. 7-6-18

Submitter Information

Name: Mimi Hodsoll

Address:

2438 Caron Lane

Falls Church, VA, 22043

Email: mhodsoll@verizon.net

Phone: 7036980180

Fax: 22043

General Comment

I want my tax dollars to stop the availability and proliferation of guns.

PUBLIC SUBMISSION

As of: 7/16/18 12:19 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-5s7s Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1136

Public comment 407. Individual. Anonymous. 7-6-18

Submitter Information

Name: anonymous Anonymous

General Comment

It seems to me that what we need is MORE control of firearms, especially assault weapons, in our country. In the Constitution, the "right to bear firearms" did not apply to firearms such as we have now!!!

PUBLIC SUBMISSION

As of: 7/16/18 12:15 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-eeko Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1135

Public comment 408. Individual. Sharon Ofenstein. 7-6-18

Submitter Information

Name: Sharon Ofenstein

Address:

Pepperell, Middlesex, 01463-1210

Email: ofensteinsko@gmail.com

Phone: 9784333120

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. There is NO place in civilian life that warrants the availability of semiautomatic assault weapons.

PUBLIC SUBMISSION

As of: 7/16/18 12:14 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-j6br
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1134

Public comment 409. Individual. Margaret Johnston. 7-6-18

Submitter Information

Name: Margaret Johnston

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms regulation is important both inside our borders and outside, and exports should be regulated by the department which is concerned with national security and diplomacy.

PUBLIC SUBMISSION

As of: 7/16/18 12:13 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-svu9 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1133

Public comment 410. Individual. Joan Armer. 7-6-18

Submitter Information

Name: Joan Armer

Address:

477 Third Ave.

Los Angeles, CA, 90032

Email: armerzoo@aol.com

Phone: 312-339-4927

General Comment

Getting rid of control of firearms is surely a totally insane idea, and will lead to more needless violence around the world. Stop this action NOW!

PUBLIC SUBMISSION

As of: 7/16/18 12:12 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-h5bi Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1132

Public comment 411. Individual. William White. 7-6-18

Submitter Information

Name: William White

Address:

Fort Walton Beach, FL, 32548

Email: U2RHUMAN@EARTHLINK.NET

General Comment

The NYT was right. We've become a circular firing squad!! Thousands dying yearly and this country owns 40% of the world's privately owned arms. When will this insanity stop. Hunting and target shooting? Right! We may be the next one hunted or targeted...

PUBLIC SUBMISSION

As of: 7/16/18 12:11 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-lj9i Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1131

Public comment 412. Individual. Jackie Lee. 7-6-18

Submitter Information

Name: Jackie Lee

General Comment

I oppose this rule change that would move the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. The consequences could be terrifying.

PUBLIC SUBMISSION

As of: 7/16/18 12:10 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-zuez Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1130

Public comment 413. Individual. Louis Napolitano. 7-6-18

Submitter Information

Name: Louis Napolitano

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I will vote against elected officials that support it.

PUBLIC SUBMISSION

As of: 7/16/18 12:09 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-vbru
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1129

Public comment 414. Individual. Mehdi Vakili. 7-6-18

Submitter Information

Name: Mehdi Vakili

General Comment

The second amendment was always about allowing the states to maintain a standing army. The fact that includes a qualifier on "an organized militia" means that there is a limit to how and when this "right" applies. This was written in English so even conservative monolingual individuals SHOULD be able to understand it. ONLY the state has the right to establish a militia, so NO, NOT EVERY don, don jr., or eric is allowed to carry a saturday night special let alone a RPG! If they have such a problem with it, maybe they should talk to betsy devoss about what an awful job she did at the Department of Education. After all they are all the product of private schools.

PUBLIC SUBMISSION

As of: 7/16/18 12:08 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-aps
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1128

Public comment 415. Individual. Jessica Kusiak-Peters. 7-6-18

Submitter Information

Name: Jessica Kusiak-Peters

Address:

267 Shoreview Way
St. Joseph, MI, 49085

General Comment

I am extremely concerned about these proposed rule changes. Overseas weapons sales are not just simple financial transactions with little or no consequences if goods are ultimately resold or otherwise passed along to third parties. Allowing weapons to leave these borders should require extra oversight to make sure that we do not inadvertently cause problems diplomatically or allow our troops do not find themselves under attack from our own weapons. These are complex matters that require a careful weighing of many interests. The system currently in place, with the State Department providing oversight, is better able to address the myriad of concerns. With all due respect, the Commerce Department simply is incapable of bringing the same degree of insight to these matters as their focus is mostly on the monetary, rather than the practical implications for foreign policy and national security. The president and those in his administration like to talk about their concern for national security, but these proposed changes suggest otherwise. I trust actions, not empty words. These changes should not be adopted.

PUBLIC SUBMISSION

As of: 7/16/18 12:06 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-ulsx Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1127

Public comment 416. Individual. Elizabeth Shepherd. 7-6-18

Submitter Information

Name: Elizabeth Shepherd

Address:

New York, NY, 10033-5356

Email: woodberry83@yahoo.ca

Phone: 2127408989

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It just means more assault weapons in the most destructive hands.

PUBLIC SUBMISSION

As of: 7/16/18 12:05 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-1gaz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1126

Public comment 417. Individual. Susan Way. 7-6-18

Submitter Information

Name: Susan Way

General Comment

I oppose any rule change that would move the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. Promoting the export and sale of more dangerous weapons is not in United States national security, or ultimately business, interests.

PUBLIC SUBMISSION

As of: 7/16/18 12:05 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-nqbd Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1125

Public comment 418. Individual. Merle Molofsky. 7-6-18

Submitter Information

Name: Merle Molofsky

Address:

10 Evergreen Way

Sleepy Hollow, NY, 10591

Email: mmipsya@gmail.com

General Comment

I am opposed to the proposed rule change that would switch the regulations of firearm exports from the United States State Department to the United States Commerce Department. There is a difference between concerns about Homeland Security and concerns about corporate profits.

PUBLIC SUBMISSION

As of: 7/16/18 12:03 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-86o3 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1124

Public comment 419. Individual. Tim Barrington. 7-6-18

Submitter Information

Name: Tim Barrington

Address:

344 N 5th St #6

San Jose, 95112

Email: tim_barrington@hotmail.com

Phone: 4082838100

General Comment

To Whom It May Concern,

I am writing to indicate that I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Thank you in advance for your consideration of my thoughts.

PUBLIC SUBMISSION

As of: 7/16/18 12:02 PM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-mc37
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1123

Public comment 420. Individual. Cheryl Bettigole. 7-6-18

Submitter Information

Name: Cheryl Bettigole

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. These are dangerous weapons whose export shouldn't be guided just by economic/commerce considerations.

Thank you for your consideration.

Cheryl Bettigole, MD, MPH

PUBLIC SUBMISSION

As of: 7/16/18 12:00 PM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-bs2p Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1122

Public comment 421. Individual. Beth Fischer. 7-6-18

Submitter Information

Name: beth Fischer

Address:

320 Marengo Ave.

Forest Park, 60130

Email: bethfischer320@netzero.com

Phone: 7087712680

Fax: 60130

General Comment

Don't transfer gun authority!

PUBLIC SUBMISSION

As of: 7/16/18 11:59 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-gvmw Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1121

Public comment 422. Individual. Ramon Sandoval. 7-6-18

Submitter Information

Name: Ramon Sandoval

General Comment

Have better gun laws and better background checks and stop taking money from the Russian funded NRA.
Russia is the Enemy.

PUBLIC SUBMISSION

As of: 7/16/18 11:57 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-tqmr Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1120

Public comment 423. Individual. Bruce Hlodnicki. 7-6-18

Submitter Information

Name: Bruce Hlodnicki

Address:

6235 LAWRENCE DR.

INDIANAPOLIS, IN, 46226

Email: bjh55@sbcglobal.net

Phone: 3178795674

General Comment

Do not make exportation of weapons of war any easier. This is a matter of safety and security for our neighbors and allies. The greedy bastards who manufacture guns just can't get enough blood money!

PUBLIC SUBMISSION

As of: 7/16/18 11:55 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-nccj Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1119

Public comment 424. Individual. Marianne Ewing. 7-6-18

Submitter Information

Name: marianne ewing

Address:

299 elm rd

bolinas, 94924

Email: ewingmiddleton@gmail.com

Phone: 4158682038

Fax: 94924

General Comment

the bis new proposed rule is a bad rule there must be control of munitions.

PUBLIC SUBMISSION

As of: 7/16/18 11:54 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-9tym Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1118

Public comment 425. Individual. Howard Smith MD. 7-6-18

Submitter Information

Name: Howard Smith MD

General Comment

The possession of ALL DEADLY WEAPONS should be regulated in a civilized society!

PUBLIC SUBMISSION

As of: 7/16/18 11:53 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-9441-5pgg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1117

Public comment 426. Individual. Diana Cowans. 7-6-18

Submitter Information

Name: Diana Cowans

Address:

PO BOX 14666

BRADENTON, FL, 34280

Email: cognitas@msn.com

Phone: 6784474840

General Comment

I strongly oppose the proposed BIS rule change that would remove control of the sale of firearms and related items from the USML. This is a clear and blatant attempt by the NRA to allow the US to become the arms dealer to the world, with no concern for our national security or for anyone's safety. The NRA knows that our current administration is quite willing to support firearms sales to everyone. This is a quid pro quo for the massive donations that the NRA makes to many in our current government.

If we allow this rule change, we will be harming America's security and the safety of the entire world. This is not what most of us want for America. We want a safer world, not a world where gun dealers can supply arms to anyone who can pay the price, without reasonable oversight.

Please do not approve this change. Demonstrate some maturity and common sense and show the world that America has not lost all common sense and ethical and moral behavior.

PUBLIC SUBMISSION

As of: 7/16/18 11:52 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-9441-3pgx Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1116

Public comment 427. Individual. Ann Leonard. 7-6-18

Submitter Information

Name: Ann Leonard

Address:

Freeville, NY, 13068

Email: artisan@frontiernet.net

Phone: 6078448706

Organization: Self Employed

General Comment

This insane proposed rule would open the floodgates for more guns everywhere! This is insane! Removing this safeguard would put more guns in the hands of terrorists, criminals and the mentally unstable. STOP THIS MADNESS!!!

PUBLIC SUBMISSION

As of: 7/16/18 11:51 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-di42
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1115

Public comment 428. Individual. Ms. Duprey. 7-6-18

Submitter Information

Name: Ms. Duprey

General Comment

This is insanity to switch the regulations of firearms export from the US State Department to the US Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I very strongly oppose this rule change.

PUBLIC SUBMISSION

As of: 7/16/18 11:50 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-n3g0 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1114

Public comment 429. Individual. Kathleen Butt. 7-6-18

Submitter Information

Name: Kathleen Butt

Address:

8845 166th Ave NE B206
Redmond, 98052

Email: kateabutt@hotmail.com

Phone: 4258813185

Fax: 98052

General Comment

The United States of America has more firearms per capita than any other nation. We also have an extraordinarily high rate of death by gun violence. We must find a way to control access to guns.

PUBLIC SUBMISSION

As of: 7/16/18 11:48 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-j9fp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1113

Public comment 430. Individual. Judy Schultz. 7-6-18

Submitter Information

Name: Judy Schultz

General Comment

I am strongly opposed to this rule change and ask that regulations of firearms remain under the jurisdiction of the State Department. The sale of firearms to other countries is a matter of national security, and it is not only inappropriate but dangerous for these sales to be regulated by the Commerce Department. The dangers this rule change pose include firearms reaching oppressive regimes, organized crime, and terrorists, as well as 3-D printing of firearms. There is no justification for this rule change - the profits of gun manufacturers and their lobbyists do not justify the increased danger to Americans and our national security that this proposed rule change poses.

PUBLIC SUBMISSION

As of: 7/16/18 11:47 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-1pdc Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1112

Public comment 431. Individual. Maryann Pitman. 7-6-18

Submitter Information

Name: Maryann Pitman

Address:

179 US Hwy 158 Bus E
Gatesville, 27938

Email: berts-girl@hotmail.com

Phone: 2523570783

Fax: 27938

General Comment

The last thing our gun ridden society requires is more access to destructive weapons. We don't need less regulatio, we need more. I am tired of reading about mass shootings.

PUBLIC SUBMISSION

As of: 7/16/18 11:46 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-cg92
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1111

Public comment 432. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

So, really anti-terrorist, anti-crime on this lemon. Flooding the world with guns WILL NOT make anyone safer, not even you. This is like saying that it hurts to bang your head against the wall so clearly you've gotta bang harder. This is like thinking that cars are dangerous so everyone needs to be in a car all the time. This is like every other idiotic, dangerous, stupid, ignorant, greedy, venial act this mal-administration has done so far. Can't you take a break channeling the anti-Christ even for a day or two? Why do you hate America and Americans so much?

PUBLIC SUBMISSION

As of: 7/16/18 11:45 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-ahis Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1110

Public comment 433. Individual. Deborah Bannister. 7-6-18

Submitter Information

Name: Deborah Bannister

General Comment

We dont want all guns taken away, we want reasonable and necessary background checks. Also, all gun sellers should have to require gun background checks. There could be a database of people who have had and passed background checks...vendors could have access to this database and use it to verify before purchasing. If you are unwilling to have a background check, I would question your fitness to purchase.

PUBLIC SUBMISSION

As of: 7/16/18 11:43 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-lt5e Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1109

Public comment 434. Individual. Michael Prymula. 7-6-18

Submitter Information

Name: Michael Prymula

General Comment

Gun control must happen

PUBLIC SUBMISSION

As of: 7/16/18 11:42 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-y5k4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1108

Public comment 435. Individual. Melanie Goldberg. 7-6-18

Submitter Information

Name: Melanie Goldberg

Address:

1350 Marin

Albany, CA, 94706

Email: Mgtrainer@gmail.com

General Comment

Please strengthen gun control laws. Do not weaken them in anyway. Obviously this is a huge problem. Thousands of people are dying every year because gun control laws are not strong and tough enough. When will this change? How many people have to die? Im scared to go to a movie theater. Im scared to send my children to school. All because crazy angry people have plenty of access to guns. It makes no sense.

PUBLIC SUBMISSION

As of: 7/16/18 11:41 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-7p2o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1107

Public comment 436. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change will eliminate Congressional oversight for important gun export deals and transfers the cost of processing licenses from gun makers to taxpayers. It also removes statutory license requirements for brokers which could increase the risk of trafficking.

The Commerce Department does not have the resources to enforce export controls.

This change transfers gun export licensing from an agency with the mission to promote stability, conflict reduction and human rights, to an agency whose mission is to promote trade. Please do NOT make this rule change.

Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 11:40 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-iide
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1106

Public comment 437. Individual. Richard Smith. 7-6-18

Submitter Information

Name: richard smith

General Comment

Munitions are munitions, period. Changing the way these things are regulated is WRONG, and immoral, and nothing but a boon to the NRA and the weapons industry they represent, at the expense of good governance and laws that have been PROVEN to work, for a long long time.

PUBLIC SUBMISSION

As of: 7/16/18 11:38 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-3j7r Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1105

Public comment 438. Individual. Alexandra Lifshin. 7-6-18

Submitter Information

Name: Alexandra Lifshin

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would have frightening national security implications

PUBLIC SUBMISSION

As of: 7/16/18 11:37 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-dmqq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1104

Public comment 439. Individual. John Woods. 7-6-18

Submitter Information

Name: John Woods

General Comment

I am deeply concerned by the proposal to move firearms from ITAR to EAR.

I work in the space industry, where we must be exceptionally careful in our handling not only of materials but of knowledge concerning anything that could be used in a weapons system. We are taught that a rocket, even one designed for peaceful purposes, is to be treated as a potential missile.

If ITAR regulates potential weapons, it ought to regulate actual weapons. If it doesn't, perhaps we should be looking at sharing more of our space technologies (which aren't weapons) with the rest of the world via EAR.

Moreover, the State Department not Commerce ought to have the final say on where weapons are exported and by whom, as weapon export has an obvious effect on our ability to participate in diplomacy. The Commerce Department should not be saddled with the responsibility of conducting diplomacy.

PUBLIC SUBMISSION

As of: 7/16/18 11:36 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-2fsx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1103

Public comment 440. Individual. Carol Rowland. 7-6-18

Submitter Information

Name: Carol Rowland

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It seems the height of folly to have the regulation of firearms export overseen by a department concerned with the well being of its citizens to a department whose bottom line would tend towards how much money can be made.

Thank you for considering my comments.

PUBLIC SUBMISSION

As of: 7/16/18 11:35 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-sxru
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1102

Public comment 441. Individual. Anne Doane. 7-6-18

Submitter Information

Name: Anne Doane

General Comment

To: Bureau of Industry and Security,

The proposed rule to no longer monitor and control firearms and ammunition is by far is one of the most blatant attempts of the NRA to influence a governmental safety measure. Controlling and monitoring firearms and ammunition helps prevent the attempts of individuals and groups to obtain mass quantities of firearms and ammunition with no oversight and can lead to misuse of these firearms and ammunitions. Please maintain the current laws that monitor and control these items and please place more common sense gun and ammunition laws to help protect the average American citizen.

Thank you,

Anne Doane

PUBLIC SUBMISSION

As of: 7/16/18 11:34 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-t0d4 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1101

Public comment 442. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

For the safety of our fellow people EVERYWHERE, please keep this within our State Department. Thank you!

PUBLIC SUBMISSION

As of: 7/16/18 11:33 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-qwr4 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1100

Public comment 443. Individual. Lora Stakey. 7-6-18

Submitter Information

Name: Lora Stakey

General Comment

Ban assault weapons now!

PUBLIC SUBMISSION

As of: 7/16/18 11:32 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-vxcx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1099

Public comment 444. Individual. Holly Neal. 7-6-18

Submitter Information

Name: Holly Neal

General Comment

I oppose the proposed rule change that would shift regulatory responsibility from the US State Department to the Department of Commerce. This proposal has a clear intention of greatly expanding arms exports without any consideration about public safety, making us all less safe.

PUBLIC SUBMISSION

As of: 7/16/18 11:31 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-3cta Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1098

Public comment 445. Individual. Helgaleena Healingline. 7-6-18

Submitter Information

Name: Helgaleena Healingline

General Comment

Please do not relax ANY gun controls. The exact opposite is what's needed at this time, with firearms related deaths rising in our nation.

PUBLIC SUBMISSION

As of: 7/16/18 11:29 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-2ujm Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1097

Public comment 446. Individual. Nancy McRae. 7-6-18

Submitter Information

Name: Nancy McRae

Address:

9 Groton St

Apt 2

Pepperell, 01463

Email: sirredbar@verizon.net

Phone: 978433

Fax: 01463

General Comment

We don't need to export our unique gun violence problem to other countries by moving the handling of export licenses for assault style weaponry from State to the Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 11:28 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-u3ht Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1096

Public comment 447. Individual. Gregory D Simpson. 7-6-18

Submitter Information

Name: Gregory D Simpson

Address:

13311 Riggs Way
Windermere, 34786

Email: buflosab31@yahoo.com

General Comment

How many more DEATHS? The 2nd amendment is just that an amendment not a commandment.

PUBLIC SUBMISSION

As of: 7/16/18 11:27 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-fto4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1095

Public comment 448. Individual. Bruce Carroll. 7-6-18

Submitter Information

Name: Bruce Carroll

General Comment

Dear legislator,

I oppose any and all regulations proposed by the NRA. I oppose any and all REMOVAL of regulations that the NRA approves. I will oppose any votes that are undertaken by any legislator that accepts NRA money for the NRA's advantage. I will continue to oppose all of these things until the situation changes drastically. Also, dear legislator, I will continue to oppose YOU until your votes are more in line with the safety and security of the citizens of America.

PUBLIC SUBMISSION

As of: 7/16/18 11:26 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-ji4y Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1094

Public comment 449. Individual. Manuel Rosenbaum. 7-6-18

Submitter Information

Name: Manuel Rosenbaum

General Comment

We simply need very strong and sensible gun control.

PUBLIC SUBMISSION

As of: 7/16/18 9:25 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-6noi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1070

Public comment 450. Individual. Barbara Wilson. 7-6-18

Submitter Information

Name: Barbara Wilson

Address:

16520 Wild Plum Circle

Morrison, CO, 80465

Email: redplumcir@aol.com

Phone: 303-697-5859

Fax: n/a

General Comment

I wish to submit my opinion regarding switching the regulations of fire arms from the State Dept to the Dept of Commerce. I am STRONGLY in OPPOSITION to this change, as it would potentially make our country and the world more dangerous than they are already. If this switch were to occur, the State Dept would no longer be able to restrict 3-D printing of weapons, thereby opening the floodgates for the production/distribution of more weapons. I've been told that this would also remove licensing requirements for brokers, and would stop the program that inspects pre-licensing of guns and issues reports. We are already seen by the world to be unrestrained 'cowboys', We need to become more insightful in regard to the proliferation of weapons that make it into the hands of terrorists, international gangs and organized crime, and without the State Dept oversight and regulatory authority, firearms will be exported to anyone with money. I cannot conceptualize the need to switch control of firearm exports - - please do not approve this item.

PUBLIC SUBMISSION

As of: 7/16/18 9:23 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-k9rk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1069

Public comment 451. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Though I'm sure it would be profitable for gun manufacturers, it would create serious consequences for our country, not the least of which could ultimately be an increased security threat of our own making.

PUBLIC SUBMISSION

As of: 7/16/18 9:22 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-ehhk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1068

Public comment 452. Individual. Nancy Shaw. 7-6-18

Submitter Information

Name: Nancy Shaw

General Comment

I strongly object to this rule change! It would be a travesty to transfer the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This moves the emphasis from SAFETY of American Citizens to COMMERCE! Much more is at stake than \$\$\$.

Please reconsider.

PUBLIC SUBMISSION

As of: 7/16/18 9:21 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-roab
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1067

Public comment 453. Individual. Michael Clarke. 7-6-18

Submitter Information

Name: Michael Clarke

General Comment

I am opposed to the proposed rule change being sought by the State Department. This is a dangerous move by the State Department which will create more gun violence for other countries involved in the sale of US made firearms and munitions. Semi automatic assault rifles should not be reclassified by the Dept. of State as "non-military" type arms. Members of the US military, as well as groups engaged in armed conflict around the world. The proposal to essentially transfer the cost of processing licensing fees from gun manufacturers to taxpayers is unacceptable. Taxpayers should not have to bear the financial cost of the transactions which companies that sell guns engage in. The removal of statutory license requirements for brokers increases risk of trafficking of these firearms. Businesses in the United States should be able to sell guns to foreign governments, but under the assurance that the weapons sold will not fall risk to trafficking. This proposal enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. I am firmly opposed to removing this current prohibition on the 3D printing of firearms. We do not need to add even more enforcement responsibilities to the Dept. of Commerce when it currently has a hard time regulating current export controls. This provision transfers gun export licensing from an agency with a mission of promoting stability, conflict reduction, and human rights, to an agency with mission to promote trade. I, as a private citizen and a taxpayer am against all potential changes which the President has proposed with regards to the exporting of firearms and munitions.

PUBLIC SUBMISSION

As of: 7/16/18 9:19 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-q6wu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1066

Public comment 454. Individual. Alison Redford. 7-6-18

Submitter Information

Name: Alison Redford

General Comment

Regulation of firearms export should remain with the U.S. State Department. The Department of Commerce is not up to speed on safety and other regulatory concerns, nor are those concerns in the scope of the Department of Commerce. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 9:18 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-8cpq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1065

Public comment 455. Individual. Jill Radel. 7-6-18

Submitter Information

Name: Jill Radel

General Comment

STOP already!! How many must die for you to change the law and get rid of stocks and semi automatic rifles ???

PUBLIC SUBMISSION

As of: 7/16/18 9:18 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-9y5q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1064

Public comment 456. Individual. Marilyn Brenneman. 7-6-18

Submitter Information

Name: Marilyn Brenneman

Address:

945 Tenderfoot Hill road

#301

Colorado Springs, CO, 80906

Email: dbrenn1934@aol.com

Phone: 719-434-8626

General Comment

Why would you want to make it easier to buy guns after all the death and murders of so many innocent people already this year? Where is plain common sense in the thinking of more?

PUBLIC SUBMISSION

As of: 7/16/18 9:17 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-9143
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1063

Public comment 457. Individual. Susan Carter Ruskell. 7-6-18

Submitter Information

Name: Susan Carter Ruskell

General Comment

We do not need to make assault style weapons more readily available. Quite the opposite. These weapons are NOT for self defense or hunting. There is no reason for most of the general public to have assault weapons that are designed specifically for military use and are designed specifically to kill lots of people. We should be working harder to insure that people who cannot handle such responsibility are not able to get their hands on these highly specific and very dangerous tools. Public safety is at serious risk.

PUBLIC SUBMISSION

As of: 7/16/18 9:15 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-8hi6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1062

Public comment 458. Individual. Rob Axtell. 7-6-18

Submitter Information

Name: Rob Axtell

General Comment

There are too many guns in this country and the U.S. leads the world in gun injuries and deaths. Do everything in your power to make buying a gun a little more difficult so criminals and the mentally ill do not have an easy time getting them. It is the right thing to do. You probably have kids, do you want your children growing up constantly worried about being shot?

PUBLIC SUBMISSION

As of: 7/16/18 9:14 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-uj7s Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1061

Public comment 459. Individual. Melissa Heston. 7-6-18

Submitter Information

Name: Melissa Heston

Address:

1911 Hawthorne Dr.
Cedar Falls, IA, 50613

Email: heston@uni.edu

General Comment

I absolutely oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms must be treated as weapons of destruction, not simple commodities.

PUBLIC SUBMISSION

As of: 7/16/18 9:13 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-50cu Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1060

Public comment 460. Individual. Howard Ordo. 7-6-18

Submitter Information

Name: Howard Ordo

General Comment

No one except Police and our Armed Forces need more than a pistol or hunting rifle!!

PUBLIC SUBMISSION

As of: 7/16/18 9:12 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-vqcd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1059

Public comment 461. Individual. Beth Levin. 7-6-18

Submitter Information

Name: Beth Levin

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This could open the floodgates for sales of firearms internationally, which would affect our national security.

PUBLIC SUBMISSION

As of: 7/16/18 9:11 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-8nlp Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1058

Public comment 462. Individual. Diane Fails. 7-6-18

Submitter Information

Name: Diane Fails

Address:

1180 Buchman Road

Fremont, OH, 43420

Email: jb-dsfails@sbcglobal.net

Phone: 4193343309

General Comment

This is a terrible rule change. Control of firearms, guns, ammunition, and related articles is essential to defusing conflict.

It is really stupid to arm the world because we will have those same arms aimed at us. It has happened before and will again, as in Afghanistan, for example. Arms dealers will get rich, and the rest of us will get killed.

There is a reason that arms smuggling and arms dealing are viewed as dirty. It's because they are horrible crimes against humanity and lead to ever increasing violence.

THE United States should never add to the capacity for killing and maiming in the world. We can be better than that.

PUBLIC SUBMISSION

As of: 7/16/18 9:10 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-ak1k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1057

Public comment 463. Individual. Rebecca Mahmood. 7-6-18

Submitter Information

Name: Rebecca Mahmood

General Comment

The NRA's push for guns everywhere is INSANE!

PUBLIC SUBMISSION

As of: 7/16/18 9:09 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-re3j Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1056

Public comment 464. Individual. Connie Marquez. 7-6-18

Submitter Information

Name: Connie Marquez

General Comment

We need more gun control and fewer guns.

PUBLIC SUBMISSION

As of: 7/16/18 9:08 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-q8rh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1055

Public comment 465. Individual. Yvonne Rogers. 7-6-18

Submitter Information

Name: Yvonne Rogers

General Comment

International gun sale regulation needs to stay in the hands of the U.S. State Department, not the Department of Commerce. With all the Trump Administration's lengthy talk about the need to beef up national security, the idea of loosened regulations on international assault weapons sales baffles me.

PUBLIC SUBMISSION

As of: 7/16/18 9:07 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-dxj2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1054

Public comment 466. Individual. Ricann Bock. 7-6-18

Submitter Information

Name: Ricann Bock

Address:

15739 Point Monroe DR NE
Bainbridge Island, WA, 98110

Email: ricannb@icloud.com

Phone: 845-729-3334

General Comment

NO NO NO NO! U.S. We cannot move the responsibility for regulation from the State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business)! SAFETY VS COMMERCE. I know we have a capitalist country, but we cannot continue to put that first, above all else. The safety of people should come first. We have no business exporting our GUN CULTURE to the rest of the world! I repeat NO NO NO NO NO!

PUBLIC SUBMISSION

As of: 7/16/18 9:05 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-k8cb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1053

Public comment 467. Individual. Dorothy Mowry. 7-6-18

Submitter Information

Name: Dorothy Mowry

General Comment

This is a terrible idea! If guns and related items can be sold to any person or country with no regulation or control, those arms will probably be used against us in some way. They would probably be used against our allies, also...but who would know???

There are other reasons this would not be appropriate, but common sense says this will be harmful to everyone except who sells and lobbies for gun sales and support.

If the NRA is trying to promote this to increase the gun sales in our country, that is totally immoral.

I urge all with power over this proposed rule to NOT change control from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 9:04 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-7u7u
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1052

Public comment 468. Individual. Janis Dufford. 7-6-18

Submitter Information

Name: Janis Dufford

General Comment

I oppose this rule that would switch the regulation of firearms export from the US State Dept to the US Commerce Dept. The State Dept is closely aligned with our national security interests and must maintain this responsibility. Personally, I believe the world would be a much better and safer place with far fewer firearms and ammunition.

PUBLIC SUBMISSION

As of: 7/16/18 9:03 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-xsfe Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1051

Public comment 469. Individual. Valerie Davis. 7-6-18

Submitter Information

Name: Valerie Davis

Address:

714 Collier Dr

SAN Leandro,

Email: Vald50@yahoo.com

General Comment

Common sense: background checks for ALL. Even gun shows, maybe especially gun shows.

Age limit of 21 and older

No rapid fire and especially NO guns more capable than those of our police officers.

It's just common sense. Start with this and then debate any other restrictions. We all deserve to feel safe but to frighten little and big children and teachers etc for the sake of someone owning a gun is just plain ridiculous!!!

PUBLIC SUBMISSION

As of: 7/16/18 9:00 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-y7ky
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1050

Public comment 470. Individual. Judith Gibson. 7-6-18

Submitter Information

Name: Judith Gibson

Address:

523 N Bertrand St
Unit 201
Knoxville, TN, 37917

Email: judygibson@bellsouth.net

Phone: 8655250055

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department is not equipped to oversee the movement and management of firearms and munitions.

PUBLIC SUBMISSION

As of: 7/16/18 8:59 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-579p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1049

Public comment 471. Individual. Kevin Oldham. 7-6-18

Submitter Information

Name: Kevin Oldham

General Comment

It seems that the rest of the sane world already knows that less guns is better for everyone. We need to study gun deaths and the bloodthirsty gun owner mentality as if it was a disease in need of a cure. We need to better control who can purchase guns of all kinds, especially assault. I can tell from nearly everything I read that most gun owners feel the same way.

PUBLIC SUBMISSION

As of: 7/16/18 8:58 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-z8vi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1048

Public comment 472. Individual. Kristina Heiks. 7-6-18

Submitter Information

Name: Kristina Heiks

General Comment

I should think the sheer number of mass shootings since the beginning of the year would indicate a "control of firearms" is indeed necessary. We control how people drive or if they vaccinate their kids before entering school because they address public health issues. Death from guns is a public health issue

PUBLIC SUBMISSION

As of: 7/16/18 8:57 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-8gjb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1047

Public comment 473. Individual. Jean Lewandowski. 7-6-18

Submitter Information

Name: Jean Lewandowski

General Comment

As a mother and grandmother, I oppose the proposal to move oversight for international arms sales from the state department to the commerce department. We don't need to be freely exporting our culture of armed aggression to endanger other children in other nations. The only winners would be the arms manufacturers, and their profits are just fine as it is.

PUBLIC SUBMISSION

As of: 7/16/18 8:56 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-f83i Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1046

Public comment 474. Individual. Rita Glasscock. 7-6-18

Submitter Information

Name: Rita Glasscock

General Comment

WHEN are we going to start VALUING OUR CHILDREN'S LIVES MORE THAN OUR GUNS ??? SHAME ON YOU !!!!

PUBLIC SUBMISSION

As of: 7/16/18 8:54 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-tvd6 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1045

Public comment 475. Individual. Steven Iszauk. 7-6-18

Submitter Information

Name: Steven Iszauk

Address:

208 Valleyview Dr
McDonald, PA, 15057

Email: siszauk@msn.com

Phone: 4122212469

Fax: 15057

General Comment

I strongly oppose this proposed rule change to switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 8:53 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-5gls
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1044

Public comment 476. Individual. Mark Smith. 7-6-18

Submitter Information

Name: Mark Smith

Address:

8265 Schroeder Rd

Oconto Falls, WI, 54154

Email: morgsat1@gmail.com

Phone: 9206714495

General Comment

No exporting of guns. Thanks, Mark

PUBLIC SUBMISSION

As of: 7/16/18 8:51 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-jk7r Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1043

Public comment 477. Individual. Linsay Firman. 7-6-18

Submitter Information

Name: Linsay Firman

Address:

1818 Newkirk Ave #1B

Brooklyn, NY, 11226

Email: ltfirman@yahoo.com

Phone: 9175895903

Fax: 11226

General Comment

I believe that the international sale of weapons should continue to be regulated by the US State Department, not the Department of Commerce. This is a question of national security, not economics.

Thank you,

PUBLIC SUBMISSION

As of: 7/16/18 8:50 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-lbrz Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1042

Public comment 478. Individual. Marianne Caston. 7-6-18

Submitter Information

Name: Marianne Caston

Address:

GOLETA, CA, 93117

Email: mdcaston@gmail.com

Phone: 8059678760

General Comment

This government run by a corrupt president is making our lives far less safe every day. This is just another way he can destabilize the people and make it far more easy to use guns to kill people. Trump seems to think that these regulations are an impediment to freedom, but in fact they are exactly what the people want... fewer guns out in our homes, streets and neighborhoods. These guns should certainly be under the US Munitions control.

PUBLIC SUBMISSION

As of: 7/16/18 8:49 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-kgqr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1041

Public comment 479. Individual. Linda A. Heath. 7-6-18

Submitter Information

Name: Linda A. Heath

Address:

12112 Indian Hollow Road
Grafton, OH, 44044

Email: heathster52@gmail.com

Phone: 3309983716

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Our world is very unsafe and unstable at the present time. How much more unsafe and unstable will it become if this rule change should go into effect? Please do not let a few extremists dictate a US that is drastically different from the one envisioned by our Founding Fathers!

PUBLIC SUBMISSION

As of: 7/16/18 8:48 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-uxrf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1040

Public comment 480. Individual. James Thomas. 7-6-18

Submitter Information

Name: James Thomas

General Comment

American gun and ammunitions manufacturers must not be allowed to sell their products outside US borders. They will be sold to crooks and terrorists and used against US citizens. No sales of guns or ammo!!

PUBLIC SUBMISSION

As of: 7/16/18 8:47 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-xm8n
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1039

Public comment 481. Individual. Tracey Katsouros. 7-6-18

Submitter Information

Name: Tracey Katsouros

General Comment

The NRA are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Please do not allow this to happen. Thank you for your time and consideration on this matter.

PUBLIC SUBMISSION

As of: 7/16/18 8:46 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-k8x1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1038

Public comment 482. Individual. Stephen Durbin. 7-6-18

Submitter Information

Name: Stephen Durbin

Address:

Coupeville, WA, 98239

Email: kilo34@cablespeed.com

General Comment

NO MORE GUNS...NOT MORE GUNS LIKE THE nra WANTS BECAUSE THEY ARE GUN AND AMMO MAKERS WHORES...STRICT REGULATION...TAKE GUNS FROM ABUSERS AND FELONS...MAKE AR-TYPE RIFLES AND HIGH CAPACITY MAGAZINES ILLEGAL T

PUBLIC SUBMISSION

As of: 7/16/18 8:45 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-u43y Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1037

Public comment 483. Individual. T Logan. 7-6-18

Submitter Information

Name: t Logan

General Comment

guns and commerce.. hmmm, is that really how deadly weapons should be moved out as consumer goods?? This is so wrong headed and clearly a greed imperative, no regard for effect.

PUBLIC SUBMISSION

As of: 7/16/18 8:43 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-zuqo
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1036

Public comment 484. Individual. Elizabeth Hegeman. 7-6-18

Submitter Information

Name: elizabeth hegeman

General Comment

not more guns!!!!!!

PUBLIC SUBMISSION

As of: 7/16/18 8:42 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-okrs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1035

Public comment 485. Individual. Michelle McKenney. 7-6-18

Submitter Information

Name: Michelle McKenney

General Comment

I strongly oppose the rule change that would transfer the regulations of firearms export from the U.S. State Department, to the U.S. Commerce Department. The sale of firearms is not simply a commercial endeavor, but with advanced weapons, can also become a national safety issue.

PUBLIC SUBMISSION

As of: 7/16/18 8:41 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-ljtf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1034

Public comment 486. Individual. Sue Whitlock. 7-6-18

Submitter Information

Name: Sue Whitlock

General Comment

We would be at high risk for national security cause we wouldn't have any control on firearm sales!

PUBLIC SUBMISSION

As of: 7/16/18 8:40 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-kuju Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1033

Public comment 487. Individual. Tara Bridges. 7-6-18

Submitter Information

Name: Tara Bridges

General Comment

Too many guns means more people will die and more money will be spent on prisons. We need to ban assault weapons and keep them out of the hands of people with mental illnesses.

PUBLIC SUBMISSION

As of: 7/16/18 8:39 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-idnm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1032

Public comment 488. Individual. Katharine L. 7-6-18

Submitter Information

Name: Katharine L.

General Comment

Please do not transfer authority over the sale/export of firearms from the State Department to the Department of Commerce. The State Department has the necessary expertise, which Commerce lacks, to safeguard our national security by preventing sales going to international bad actors. Moreover, the Department of Commerce necessarily seeks to boost sales of US products and exports overseas, which will result in an increased number of firearms "out there" in the world. Given the number of countries, groups, and terrorists that seek harm to the US and its citizens, this is a patently bad idea. This rule change makes no sense whatsoever, except as a means of boosting profits for (already profitable) gunmakers and pleasing special interests like the NRA.

PUBLIC SUBMISSION

As of: 7/16/18 8:39 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-93xr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1031

Public comment 489. Individual. Barbara Jacoby. 7-6-18

Submitter Information

Name: Barbara Jacoby

General Comment

Please, do NOT LET THIS HAPPEN! We have enough horror dealing with too-lax gun laws as it IS!

PUBLIC SUBMISSION

As of: 7/16/18 8:31 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-haur Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1030

Public comment 490. Individual. John Lyne. 7-6-18

Submitter Information

Name: John Lyne

Address:

1602 E Byrd Avenue

Coolidge, AZ, 85128

Email: johnplyne@gmail.com

Phone: 4029909596

Fax: 85128

General Comment

Automatic weapons need to be banned, any civilian firearms need to be tightly regulated and kept out of the hands of criminals & unstable individuals! It's the only way to stop the carnage in the streets. Right to bear arms does Not belong in the Constitution, totally outdated!!

PUBLIC SUBMISSION

As of: 7/16/18 8:29 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-qjzf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1029

Public comment 491. Moms Rising. Jean Greaves. 7-6-18

Submitter Information

Name: Jean Greaves

Organization: Moms Rising

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a threat to national security at the very least.

PUBLIC SUBMISSION

As of: 7/16/18 8:27 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-bvfw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1028

Public comment 492. Individual. Linda Wheatley. 7-6-18

Submitter Information

Name: Linda Wheatley

Address:

1064 South 800 East

SLC, UT, 84105

Email: slcmermaid@hotmail.com

General Comment

I oppose the rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department

What could possibly go wrong!!??

The consequences of this regulatory change have obviously not been thought through--like a lot of other Trump policy decisions. (Do we really want a repeat of the fiasco we now have on the southern border? That's what happens when things are not thought through.)

The consequences of this rule change include the escalation of violence and destabilization of local governments all over the world. Literally. Groups from Africa to Ukraine, to Central America, the West Bank, and southeast Asia--groups as diverse as narc-o-terrorists, organized crime gangs, oppressive oligarchs, and insurgent elements in civil wars everywhere (literally everyone from MS-13 to ISIS) will now be able to acquire American-made armaments and munitions--in any quantity--with minimal scrutiny. The escalation of violence and oppression of political opposition anywhere not only harms its immediate victims, it also drives the flight of refugees seeking asylum which the Trump administration ostensibly wants to STOP--with either a wall or travel ban. However, this rule change exacerbates that particular problem. An "open arms market" does not improve national security; it actually worsens it.

Therefore I oppose this rule change. ..

PUBLIC SUBMISSION

As of: 7/16/18 8:26 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-afbd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1027

Public comment 493. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Bring back mental health monitoring
Require educational training
Close background check loopholes at gun shows
Ban assault rifles
Jail time for parents/people who do not safeguard children from gun access.

PUBLIC SUBMISSION

As of: 7/16/18 8:24 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-n4y9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1026

Public comment 494. Individual. Sara Katz. 7-6-18

Submitter Information

Name: Sara Katz

Address:

627 14th street

Manhattan Beach, CA, 90266

Email: sarakatzm@gmail.com

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/16/18 8:23 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944m-jh4d Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1025

Public comment 495. Individual. Anastasia Yovanopoulos. 7-6-18

Submitter Information

Name: anastasia yovanopoulos

Address:

3718 24th st

san francisco, CA, 94114

Email: shashacooks@yahoo.com

General Comment

This proposed regulation is terribly unwise because firearms, guns, ammunition and related articles would not be regulated at all. Allowing an irresponsible president, who has no sense of how to protect American citizens or people all over the world, to disallow dangerous weapons from being controlled, is an extremely reckless policy proposal and must not be permitted.

Please do not proceed to implement this proposed rule. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 8:21 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944m-ov8a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1024

Public comment 496. Individual. Cara Harrison. 7-6-18

Submitter Information

Name: Cara Harrison

Address:

300 El Paso St
Austin, 78704

Email: haracarrison@yahoo.com

Phone: 5126266256

Fax: 78704

General Comment

am writing in opposition to the proposal for the U.S. to become a major international weapons dealer. The proposed rule changes are wrong and dangerous for many reasons including:

--Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

--Eliminates Congressional oversight for important gun export deals.

--Transfers the cost of processing licenses from gun manufacturers to taxpayers.

--Removes statutory license requirements for brokers, increasing risk of trafficking.

--Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

--Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

T--he Commerce Department does not have the resources to enforce export controls, even now.

Please do not go forward with this proposed change in rule.

PUBLIC SUBMISSION

As of: 7/16/18 8:20 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944n-wse8 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1023

Public comment 497. Individual. Ann Anonymous. 7-6-18

Submitter Information

Name: Ann Anonymous

General Comment

Do not change the existing rule of law. We should not be encouraging the sale of guns around the world.

PUBLIC SUBMISSION

As of: 7/16/18 8:17 AM Received: July 06, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-944n-1v2w Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1022

Public comment 498. Individual. Joanne Nikides. 7-6-18

Submitter Information

Name: Joanne Nikides

Address:

5106A Murphy School Rd
Durham, 27705

Email: nikidesj@msn.com

Phone: 9194250870

General Comment

This is the dumbest idea youve had yet.

PUBLIC SUBMISSION

As of: 7/16/18 8:12 AM
Received: July 06, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-944n-984j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1021

Public comment 499. Individual. Susan Soroka. 7-6-18

Submitter Information

Name: Susan Soroka

Address:

2300 S La Corta Dr
Tempe, AZ, 85282

Email: ssoroka49@gmail.com

Phone: 4809675689

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department is focused on safeguarding our nation in juxtaposition to the U.S. Commerce Department that is focused on promoting American business. Let's safeguard our nation.

PUBLIC SUBMISSION

As of: 7/15/18 9:28 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-ioyu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1020

Public comment 500. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It does not make sense in terms of security to make it easier for our enemies to buy weapons, assault weapons, then turn around and harm our citizens. In this era of gun violence taking innocent lives, rather than improving regulations, making sure our country's State Department is aware of arms sales, this move increases the risk of weapons ending up both in the wrong hands but also us not knowing where these weapons are going. This proposed rule change treats semiautomatic assault rifles as non-military. By definition an assault weapon is made to assault and cause harm. Assault is illegal. There is no reason to make this available to anyone. It has nothing to do with the right to bear arms. This is only about making more money..

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). Clearly, this is not about our right to bear arms as the NRA advertises itself. This is all about money and making money, without care of our country/citizens. I am so tired of our governing leaders only making decisions based on making money over everything else while professing great Christian values. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Do NOT transfer control of firearm exports to the Dept of Commerce. Think of what is right not making more money.

PUBLIC SUBMISSION

As of: 7/15/18 9:26 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-wvh7 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1019

Public comment 501. Individual. Paul Frantsman. 7-6-18

Submitter Information

Name: Paul Frantsman

General Comment

This is an action lying somewhere between tone deaf and brain dead.

PUBLIC SUBMISSION

As of: 7/15/18 9:24 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-fh4r Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1018

Public comment 502. Individual. Valerie Clark. 7-6-18

Submitter Information

Name: valerie clark

General Comment

I oppose the sale of guns to other countries under the commerce department. Spreading our weapons around the world for profit has only one motive, the big buck.

At some point you have to say no more. What is a life worth?

Australians had massive buy-backs of guns and now gun violence is a rarity.

Gun violence is our country's shame. We should not spread the shame to other countries.

PUBLIC SUBMISSION

As of: 7/15/18 9:22 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-pge8 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1017

Public comment 503. Individual. Kathleen Bungarz. 7-6-18

Submitter Information

Name: Kathleen Bungarz

General Comment

I disagree with the president's actions as far as providing safety for the American people. His recklessness shows that his concerns are with the financial backing that he receives from the N.R.A.; and not with the necessary protections that our citizens should expect.

PUBLIC SUBMISSION

As of: 7/15/18 9:20 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-273w Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1016

Public comment 504. Individual. Maria Studer. 7-7-18

Submitter Information

Name: Maria Studer

Address:

127 Springtime Lane West
LEVITTOWN, NY, 11756

Email: rstuder@optonline.net

Phone: 5165798790

Fax: 11756

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It could open the gate to terrorist states more easily getting weapons of war, possibly to use against us.

PUBLIC SUBMISSION

As of: 7/15/18 9:19 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-a3yh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1015

Public comment 505. Individual. Edward Laurson. 7-6-18

Submitter Information

Name: Edward Laurson

Address:

5901 W Lehigh Ave #13

Denver, CO, 80235

Email: gglaurson@msn.com

Phone: 303-7951133

General Comment

Stronger background checks, lower capacity magazine and stronger rules for the purchase of AR-15 type weapons.

PUBLIC SUBMISSION

As of: 7/15/18 9:18 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-rumn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1014

Public comment 506. Individual. Elisabeth N. 7-6-18

Submitter Information

Name: Elisabeth N.

General Comment

The proposed change makes no sense and is potentially disastrous. Leave well enough alone.

PUBLIC SUBMISSION

As of: 7/15/18 9:17 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-h6m6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1013

Public comment 507. Individual. Anonymous Sullivan. 7-6-18

Submitter Information

Name: Anonymous Sullivan

General Comment

USA has greatest number of Gun injuries & Deaths. USA has greatest number of guns & assault rifles of any developed country, except WAR ZONES. DO NOT FURTHER ALLOW MORE GUNS & ASSAULT RIFLES ON USA STREETS. USA is not behaving as a Civilized Society. We are behaving as a Barbaric, uncivilized Society.

PUBLIC SUBMISSION

As of: 7/15/18 9:15 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-xp1i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1012

Public comment 508. Individual. Kathleen Bovello. 7-6-18

Submitter Information

Name: Kathleen bovello

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This country and the world at large have NO need for more guns. Please keep the rule intact.

Thank you.

PUBLIC SUBMISSION

As of: 7/15/18 9:13 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-nze3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1011

Public comment 509. Individual. Thomas Stamm. 7-6-18

Submitter Information

Name: Thomas Stamm

General Comment

I am opposing this rule change... this by no means a good thing to do.. Do what is the right thing to do and stop what the money all the time

PUBLIC SUBMISSION

As of: 7/15/18 9:12 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-b5ub Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1010

Public comment 510. Individual. Diane DiFante. 7-6-18

Submitter Information

Name: Diane DiFante

Address:

53 Bennett Shade Lane

Martinsburg, WV, 25403

Email: valmntn59@gmail.com

Phone: 3345463121

General Comment

For safety and security of US population, control of arms sales MUST remain under State Dept control.

PUBLIC SUBMISSION

As of: 7/15/18 9:11 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-ed7 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1009

Public comment 511. Individual. Steven Van Grouw. 7-6-18

Submitter Information

Name: Steven Van Grouw

General Comment

I am opposed to guns sales of any kind, legal or illegal, in any place at any time. Period!

PUBLIC SUBMISSION

As of: 7/15/18 9:10 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-9rc4 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1008

Public comment 512. Individual. Andi Shotwell. 7-6-18

Submitter Information

Name: Andi Shotwell

General Comment

I oppose this rule change that would switch the regulation of firearms export from the US State Department to the US Commerce Department. This is a horrible idea. It is unsafe and we should put people ahead of dollars.

PUBLIC SUBMISSION

As of: 7/15/18 9:09 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-21tl Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1007

Public comment 513. Individual. Joseph Marchesani. 7-6-18

Submitter Information

Name: Joseph Marchesani

Address:

5 Thorncrest Dr

Pittsburgh, PA, 15235

Email: Joe.Marchesani2013@gmail.com

Phone: 4123347243

General Comment

This transfer of authority from the State Department to the Commerce Department replaces diplomacy, which advocates for alternatives to military action, with corporate self-interest, which places profit before the well-being of people around the world. It is economic imperialism in the guise of trade expansion. Such a shift is immoral and against the best interests of the United States.

PUBLIC SUBMISSION

As of: 7/15/18 8:32 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-ad2z Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1006

Public comment 514. Individual. Juli Kring. 7-6-18

Submitter Information

Name: Juli Kring

Address:

12400 Brookglade Circle

Houston, TX, 77099

Email: juli3@aol.com

General Comment

I wish to comment on the proposal making it easier to export U.S. guns and ammunition globally.

As a parent and a grandparent, this is an issue I feel very strongly about.

I have read that this proposal classifies semi-automatic assault rifles as non-military when they are used by our army. They are also used by opposing forces in armed conflicts, and are prohibited for civilian possession in many countries.

It would remove Congressional oversight for important gun export deals.

Taxpayers would have to pay processing licenses instead of gun manufacturers.

It removes statutory license requirements for brokers, increasing risk of trafficking.

I understand that the Commerce Department does not even have the resources to enforce export controls, as it is.

It reduces transparency and reporting on gun exports.

There are many other reasons that I know the above proposal is a very bad idea that will cost untold lives.

Please reconsider this ill timed and very unwise proposal.

PUBLIC SUBMISSION

As of: 7/15/18 8:30 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-jw3p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1005

Public comment 515. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

UNCONTROLLED FIREARM-RELATED DISTRIBUTION WILL FEED THE ALREADY RISING AMOUNTS OF MUNITIONS , WHICH IN TURN FEEDS THE RISE OF VIOLENCE IN OUR COUNTRY.

PLEASE OPPOSE THIS PROPOSED RULE BEFORE IT IS TOO LATE.

PUBLIC SUBMISSION

As of: 7/15/18 8:28 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-d0kr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1004

Public comment 516. Individual. Janet Gooch. 7-6-18

Submitter Information

Name: Janet Gooch

General Comment

Guns are like cars, a tool that requires skill and a clear head to safely operate. It's time to treat guns like cars.

PUBLIC SUBMISSION

As of: 7/15/18 8:27 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-eg5b Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1003

Public comment 517. Individual. Norma Neilson. 7-6-18

Submitter Information

Name: Norma Neilson

General Comment

I feel that it is very important that something is done to have stricter regulations on guns. It is terrible that innocent man, women & children are being killed every day. Please help to make our communities and public areas safe without the fear.

PUBLIC SUBMISSION

As of: 7/15/18 8:26 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-e04p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1002

Public comment 518. Individual. Victoria Meguid. 7-6-18

Submitter Information

Name: Victoria Meguid

General Comment

Commonsense gun laws NOW before theres another school disaster.

PUBLIC SUBMISSION

As of: 7/15/18 8:25 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-wzdm Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1001

Public comment 519. Individual. Nick Berezansky. 7-6-18

Submitter Information

Name: Nick Berezansky

Address:

Ridgewood, NJ, 07450

Email: pigboy@dotswillecho.com

Phone: 2016706814

General Comment

I am completely opposed to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This has serious implications for national security. The State Department needs to be in oversight of these transactions.

PUBLIC SUBMISSION

As of: 7/15/18 8:10 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-vtht Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1000

Public comment 520. Individual. Joshua Steele. 7-6-18

Submitter Information

Name: Joshua Steele

General Comment

The United States government should not be in the business of boosting the sales of guns and ammunition at the national and international levels. More gun sales makes our world less safe.

PUBLIC SUBMISSION

As of: 7/15/18 8:08 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-o0j9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0999

Public comment 521. Individual. Kathleen Querner. 7-6-18

Submitter Information

Name: Kathleen Querner

General Comment

more guns= more deaths, if population control is what you are looking for...you are on the right track. OR maybe we should do better screening and background checks, educate people on locking guns safely away from children and better mental health care for Americans...

PUBLIC SUBMISSION

As of: 7/15/18 8:06 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-genr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0998

Public comment 522. Individual. Donald Wyatt. 7-6-18

Submitter Information

Name: Donald Wyatt

Address:

301 Merritt St

River Oaks, TX, 76114-3708

Email: woowoowyatt@aol.com

Phone: 8177389840

General Comment

The AR-15 was designed to inflict maximum damage as quickly as possible. It isn't a hunting rifle, its not a self-defense measure.

The AR-15 assault rifle was engineered to create what one of its designers called "maximum wound effect." Its tiny bullets, needle-nosed and weighing less than four grams, travel nearly three times the speed of sound. As the bullet strikes the body, the payload of kinetic energy rips open a cavity inside the flesh essentially inert space, which collapses back on itself, destroying inelastic tissue, including nerves, blood vessels and vital organs. "It's a perfect killing machine," says Dr. Peter Rhee, a leading trauma surgeon and retired captain with 24 years of active-duty service in the Navy. "A handgun wound is simply a stabbing with a bullet," says Rhee. "It goes in like a nail." With the high-velocity rounds of the AR-15, he adds, "its as if you shot somebody with a Coke can." The shooter used a Smith & Wesson M&P15, a military-style assault rifle with large capacity magazines. Assault weapons were also used in previous mass shootings, including Aurora, Colorado; Newtown, Connecticut; San Bernardino, California; Umpqua Community College, Roseburg, Oregon; Sutherland Springs, Texas; and Las Vegas, Nevada.

We do not want to hear our state and federal officials offering their thoughts and prayers for this latest tragedy we want action now! Military-style assault weapons and large capacity magazines have no place in civilian society and are only designed to kill and injure large numbers of people in a short period of time.

We cannot allow the daily carnage in our country to be the new normal.

PUBLIC SUBMISSION

As of: 7/15/18 8:05 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-3hxp Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0997

Public comment 523. Individual. Antonia Salaz. 7-6-18

Submitter Information

Name: Antonia Salaz

Address:

Grand Junction, Colorado, 81503

Email: salazesmio@yahoo.com

Phone: 9702571803

Organization: 1972

General Comment

Every child that dies, because of loose policies, is going to be the fault of all those who allowed it!

PUBLIC SUBMISSION

As of: 7/15/18 7:58 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-snak Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0996

Public comment 524. Individual. Terence Travis. 7-6-18

Submitter Information

Name: Terence Travis

Address:

EWA BEACH, United States, 96706

Email: ttravis@hawaiiantel.net

Phone: 8086854460

General Comment

I am adamantly opposed to this rule change. There needs to be MORE regulation of military weapons, not less.

PUBLIC SUBMISSION

As of: 7/15/18 7:54 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-7uhx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0995

Public comment 525. Individual. Thomas Lindsey. 7-6-18

Submitter Information

Name: Thomas Lindsey

General Comment

It's a daily routine now. Turn the evening news on and see where the person or people that were murdered by guns lived.

This morning before 6 a.m. a motorcycle driver was shot and killed on a freeway near L.A.

Where will the next one be?

PUBLIC SUBMISSION

As of: 7/15/18 7:53 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-dkxb Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0994

Public comment 526. Individual. Carol Collins. 7-6-18

Submitter Information

Name: CAROL COLLINS

Address:

1935 NAULT ROAD

DOVER, DE, 19904

Email: CCOLLINS54@MSN.COM

Phone: 3026781644

General Comment

CLOSE THE FLOODGATE ON GUN SALES.

PUBLIC SUBMISSION

As of: 7/15/18 7:52 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-j4uq Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0993

Public comment 527. Individual. Barbara Evans. 7-6-18

Submitter Information

Name: Barbara Evans

General Comment

We should not be arms dealers. They go to dangerous people.

PUBLIC SUBMISSION

As of: 7/15/18 7:51 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-poq9 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0992

Public comment 528. Individual. Phillip Hlavac. 7-6-18

Submitter Information

Name: Phillip Hlavac

General Comment

Nothing needs regulating. Trump will give us everything he wants. I mean we want.

We dont need assault weapons or bumpstocks. They are un-American. They can be used against police and everyday citizens.

PUBLIC SUBMISSION

As of: 7/15/18 7:50 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-dryq Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0991

Public comment 529. Individual. Kathleen Neefe. 7-6-18

Submitter Information

Name: Kathleen Neefe

Address:

30276 madison

warren, MI, 48093

Email: kathleen-n@sbcglobal.net

Phone: 58675185555

General Comment

no blood for profits

PUBLIC SUBMISSION

As of: 7/15/18 7:48 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-wsae Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0990

Public comment 530. Individual. Bill McClain. 7-6-18

Submitter Information

Name: Bill McClain

General Comment

I am against this proposal.

PUBLIC SUBMISSION

As of: 7/15/18 7:47 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-vt5m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0989

Public comment 531. Individual. Martin Balk. 7-6-18

Submitter Information

Name: Martin Balk

Address:

Quitman, TX, 75783

Email: mjbalk@suddenlink.net

Phone: +11234567890

General Comment

MY COUNTRY IS LOOKING MORE LIKE RUSSIA EVERY DAY.

PUBLIC SUBMISSION

As of: 7/15/18 7:45 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-e22r Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0988

Public comment 532. Individual. Julie Bussgang. 7-6-18

Submitter Information

Name: Julie Bussgang

Address:

1545 Channing way
Berkeley, 94703

Email: bussgang@aol.com

General Comment

I am strongly opposed to changing the regulation of firearms exports from the jurisdiction of the US State Department to that of the US Commerce Department. The regulation of firearms exports should continue to be overseen and regulated by the State Department because it is an issue of national security and decisions about it should be made through the lense of safeguarding the public as opposed to through a business oriented lense.

PUBLIC SUBMISSION

As of: 7/15/18 7:44 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944n-rbai Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0987

Public comment 533. Individual. Susan Monaster. 7-6-18

Submitter Information

Name: Susan Monaster

General Comment

This would be a despicable rule, considering how much gun violence is occurring in the United States every day.

PUBLIC SUBMISSION

As of: 7/15/18 7:42 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-ohqa
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0986

Public comment 534. Individual. Valerie Cooper. 7-6-18

Submitter Information

Name: valerie cooper

General Comment

I don't believe man will ever learn anything from history. Who will be here after wars and murders, trophy hunting? Only weapons and ammo. What government will be the bravest, most compassionate and stand up for life and peace. Don't be afraid to be that government. Life is not about who has the biggest ,the most money, but about who cares about humanity. It's time. Past time.

PUBLIC SUBMISSION

As of: 7/15/18 7:41 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944n-w6nj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0985

Public comment 535. Individual. Kerry Sykes. 7-6-18

Submitter Information

Name: Kerry Sykes

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are weapons and should not be treated like other goods.

PUBLIC SUBMISSION

As of: 7/15/18 7:40 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-lmd4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0984

Public comment 536. Individual. John and Pamela D Wilson. 7-6-18

Submitter Information

Name: John and Pamela D Wilson

General Comment

no more thoughts and prayers. enough people have died from guns wielded by people who should not have firearms. Until you can come up with foolproof ways for guns to be ONLY in the hands of those who are deemed responsible to use them correctly and not kill journalists, party goers, teen agers, concert attendees, their fellow employees and elementary school children, church-goers and people on the street, then sensible precautions such as no bump stocks, closing the gaps on ways to automatize weapons, the size of ammunition clips and close the gaps on who can own and buy a weapon, then my rights are violated whenever people can obtain weapons, accessories and ammunition without problem. By the way, I am a gun owner. There are at least three guns in this household. We do not feel are rights are lessened by sensible gun regulations. We feel our rights are violated every time guns are used to slaughter innocent people and we must, once again, explain to our friends why we own guns. Get it together and limit those items which have nothing to do with hunting animals but are used exclusively to hunt and KILL human beings.

PUBLIC SUBMISSION

As of: 7/15/18 7:38 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-gsro Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0983

Public comment 537. Individual. Robin Gaphni.7-6-18

Submitter Information

Name: Robin Gaphni

Address:

7093 NE Bayhill

Bainbridge Island, WA, 98110

Email: rgaphni@seanet.com

General Comment

This is ludicrous. I am opposed to this on many levels, not the least of which is it will increase gun violence. We need MORE regulations not less. I vehemently oppose this.

PUBLIC SUBMISSION

As of: 7/15/18 7:37 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-q7ok
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0982

Public comment 538. Individual. Judith Niemann. 7-6-18

Submitter Information

Name: Judith Niemann

General Comment

I strongly oppose this change. Sending arms abroad puts even more weapons in the hands of our enemies and makes all of us less safe.

PUBLIC SUBMISSION

As of: 7/15/18 7:36 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-gsro Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0981

Public comment 539. Individual. Jim Kapralos. 7-6-18

Submitter Information

Name: Jim Kapralos

Address:

2076 Privet Way
Santa Rosa, CA, 95404

Email: jimkapralos@att.net

General Comment

I oppose the change proposed for export licensing of fire arms from the State Department to the Commerce Department. This change would compromise our national security.

PUBLIC SUBMISSION

As of: 7/15/18 7:33 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-t1m1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0980

Public comment 540. Individual. David Lavender. 7-6-18

Submitter Information

Name: David Lavender

Address:

441 Raritan Ave
Atco, NJ, 08004

Email: rednevals5@cs.com

Phone: 8567682511

General Comment

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. The greed has to checked in corporate America. This proposal will only make the world more dangerous for everyone. Our friends as well as our enemies.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Where has common sense gone in our America. Think!

PUBLIC SUBMISSION

As of: 7/15/18 7:32 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-dglt
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0979

Public comment 541. Individual. Ruth Lambert. 7-6-18

Submitter Information

Name: Ruth LAMBERT

Address:

1695 Independence Avenue
Melbourne, FL, 32940

Email: ruth.lambert@goddard.edu

Phone: 2032144699

General Comment

PLEASE: recognize that we have a GUN VIOLENCE EPIDEMIC and do not enable further gun possession enablement. We have children dying by the THOUSANDS each year. Enough is #Enough.

PUBLIC SUBMISSION

As of: 7/15/18 7:30 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-zscs Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0978

Public comment 542. Individual. Janet Romanishin. 7-6-18

Submitter Information

Name: Janet Romanishin

General Comment

I oppose the proposed rule change putting control of guns and ammunition under the Commerce department. There needs to be tighter control of guns.

PUBLIC SUBMISSION

As of: 7/15/18 7:29 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-2k3a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0977

Public comment 543. Individual. Rev. John Fernandes. 7-6-18

Submitter Information

Name: Rev. John Fernandes

General Comment

It is not necessary to increase weapons worldwide.

PUBLIC SUBMISSION

As of: 7/15/18 7:28 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-tvg7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0976

Public comment 544. Individual. Irwin Arnstein. 7-6-18

Submitter Information

Name: irwin arnstein

Address: 75043

Email: irwin@irwinarnstein.com

General Comment

This is a bad idea. Since when are firearms, especially civilian owned AR15s not part of the US Munitions list when the identical rounds and virtually identical weapons are used by our military and law enforcement? Let's just rely on the usual scare politics of the GOP and President to sell weapons. A change in the laws and management is not required. For the record I am a gun owner and think there should be more regulation not less as I know what guns do and how to use them. I would start with mandatory training certificates for anyone getting a gun like a driver's license. Then those in possession of weapons illegally owned could have them impounded, just as we impound cars that are not operated by a licensed operator and the guns can be retrieved when the owners have gotten or renewed their license.

PUBLIC SUBMISSION

As of: 7/15/18 7:26 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-ml9q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0975

Public comment 545. Individual. Kathleen Powers. 7-6-18

Submitter Information

Name: Kathleen Powers

Address:

5625 N Winthrop Ave
Apt 503
Chicago, 60660-4443

Email: mommypowers@hotmail.com

Phone: 7736553471

Fax: 60660-4443

General Comment

For our safety, control of firearms does NOT belong under the Department of Commerce. The US State Department is the only department that can control firearms for our safety. The Department of Commerce will do business with the highest bidder with no regard to human life. It is there to make money, not safety.

PUBLIC SUBMISSION

As of: 7/15/18 7:25 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-z4gv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0974

Public comment 546. Individual. Cyrene Aksman. 7-6-18

Submitter Information

Name: Cyrene Aksman

Address:

210 W. Cross St.

Apt. 106

Ypsilanti, MI, 48197

Email: margoaksm@hotmail.com

Phone: 7349618964

Fax: 48197

General Comment

I am against this proposed Rule to transfer the control of export licenses from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: 7/15/18 7:24 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-w9ku
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0973

Public comment 547. Individual. Michael Kemper. 7-6-1867

Submitter Information

Name: Michael Kemper

Address:

1388 California Street

San Francisco, CA, 94109

Email: mckemper84@gmail.com

Phone: 4157765657

General Comment

The society is committing suicide with its obsessive ownership of guns. If the society is to survive, it must address its gun problem. But maybe this society is irrevocably damaged, as exemplified by its president.

PUBLIC SUBMISSION

As of: 7/15/18 7:23 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-h91u
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0972

Public comment 548. Individual. Connie C. 7-6-18

Submitter Information

Name: Connie C.

General Comment

No one needs a semi-automatic weapon. Please consider making these and other high-powered assault weapons unavailable for purchase or trade.

PUBLIC SUBMISSION

As of: 7/15/18 7:21 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-vqon
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0971

Public comment 549. Individual. Richard Boyle. 7-6-18

Submitter Information

Name: Richard Boyle

General Comment

As though there aren't enough guns in our country already. We need to put an end to this.

PUBLIC SUBMISSION

As of: 7/15/18 7:10 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-6rii Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0970

Public comment 550. Individual. Elizabeth Hegeman. 7-6-18

Submitter Information

Name: elizabeth hegeman

Address:

100 riverside

ny, NY, 10024

Email: mastocke@syr.edu

Fax: 10024

General Comment

we must stop the mindless unregulated sale of GUNs!

PUBLIC SUBMISSION

As of: 7/15/18 7:09 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-y79u
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0969

Public comment 551. Individual. Guadalupe Yanez. 7-6-18

Submitter Information

Name: Guadalupe Yanez

General Comment

Damn nra, these are little insecure wannabe men, all they are little cowards that are viciously in love with damn guns! It must really be sad living by the barrels of guns. They dont value life, they guns and money.

PUBLIC SUBMISSION

As of: 7/15/18 7:07 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-qo5p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0968

Public comment 552. Individual. Michael Klein. 7-6-18

Submitter Information

Name: Michael Klein

Address:

733 w market street
akron, OH, 44303

Email: mjklein3@ameritech.net

General Comment

I forcefully oppose the rule change that would swap the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The ramifications of increased firearms change can be far deeper than just selling more freely. The political consequences could be enormous!! Imagine a thousand anarchies rising that would rival the problems we saw in Somalia, such as sea piracy and many others we have not yet imagined!!! DO NOT APPROVE THE CHANGE!!!!

PUBLIC SUBMISSION

As of: 7/15/18 7:06 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-5iwp Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0967

Public comment 553. Individual. Karyn Barry. 7-6-18

Submitter Information

Name: karyn barry

Address:

Waltham, MA, 02451

Email: karynbarry@yahoo.com

Phone: 7818946000

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. These weapons always come back to kill Americans. We need fewer guns in the world.

PUBLIC SUBMISSION

As of: 7/15/18 7:05 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-rm1e
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0966

Public comment 554. Individual. Frances Schutz. 7-6-18

Submitter Information

Name: Frances Schutz

General Comment

I urge you NOT to switch oversight of the regulations on firearms export from the U.S. State Department to the U.S. Commerce Department. We should be deeply concerned that gun sales make not only our own citizens less safe, but also the citizens of those countries to which we sell the guns made in the US.

PUBLIC SUBMISSION

As of: 7/15/18 7:04 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-du15
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0965

Public comment 555. Individual. Patricia Flaherty. 7-6-18

Submitter Information

Name: Patricia Flaherty

General Comment

As a Mom who votes, I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is turning our plowshares into swords, and selling them globally. We don't need to unleash the greed of the US gun industry on the world. The US Commerce Department only cares about material gain, not about security.

PUBLIC SUBMISSION

As of: 7/15/18 7:03 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-h240 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0964

Public comment 556. Individual. Jorge De Cecco. 7-6-18

Submitter Information

Name: Jorge De Cecco

General Comment

We need fewer guns out there, not more guns.

PUBLIC SUBMISSION

As of: 7/15/18 7:01 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-z4l3 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0963

Public comment 557. Individual. Karen Kauffman. 7-6-18

Submitter Information

Name: Karen Kauffman

Address:

923 N 7th St, Apt B

Murphysbro, IL, 62966-1640

Email: karstur@hotmail.com

Phone: 6185218799

General Comment

I oppose this rule change that would switch the regulations of the export of firearms from the U.S. State Dept to the U.S. Dept of Commerce.

PUBLIC SUBMISSION

As of: 7/15/18 6:59 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-wic5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0962

Public comment 558. Individual. Catherine Lee. 7-6-18

Submitter Information

Name: Catherine Lee

General Comment

The last thing the U.S. needs is to make it easier for businesses to supply powerful assault weapons to the world's most unstable munitions buyers. Do not enact this legislation because it:

- *Treats semi-automatic assault rifles - developed for wartime use - as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
 - *Eliminates Congressional oversight for important gun export deals.
 - *Transfers the cost of processing licenses from gun manufacturers to taxpayers.
 - *Removes statutory license requirements for brokers, increasing risk of trafficking.
 - *Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
 - *Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have the resources to enforce export controls, even now. This exemption for a new manufacturing technology cannot be applied to weapons production, if we are to consider ourselves as Americans responsible world diplomats.
 - *Reduces transparency and reporting on gun exports.
 - *Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- Do not re-direct us on a path to a more violent world, particularly not with taxpayer dollars.

PUBLIC SUBMISSION

As of: 7/15/18 6:58 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-sp9k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0961

Public comment 559. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are a product, but a very dangerous one. They need to remain under the auspices of the U.S. State Department's regulations. Guns are more carefully monitored for export by the State Department. The Commerce Department would regard the guns as it would any other good/product and only give minimal care in following the outflow and to whom. Do not change the firearms export regulations to the U.S. Commerce Department from the U.S. State Department!
Thank you for your consideration.

PUBLIC SUBMISSION

As of: 7/15/18 6:57 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-dxx Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0960

Public comment 560. Individual. Grace Strong. 7-6-18

Submitter Information

Name: Grace Strong

General Comment

Selling more guns isnt going to save any lives. Selling fewer just might.

PUBLIC SUBMISSION

As of: 7/15/18 6:55 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-kkxu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0959

Public comment 561. Individual. Mary Vrabel. 7-6-18

Submitter Information

Name: Mary Vrabel

General Comment

Gun sales should continue to be regulated by the State Department, not transferred to the Commerce Department. These are dangerous, deadly weapons and just because there is money to be made doesn't mean that selling them around the world should be made easier or encouraged.

PUBLIC SUBMISSION

As of: 7/15/18 6:53 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-alf1 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0958

Public comment 562. Individual. Madeleine Beresford. 7-6-18

Submitter Information

Name: Madeleine Beresford

Address:

158 Hope St.

Ridgewood, NJ, 07450-4505

Email: fnnsmail@gmail.com

Phone: 2016523537

General Comment

Do not open the sale of semi-automatics to other countries and export our level of gun violence around the world. More civilians killed every day as happens in this country?

PUBLIC SUBMISSION

As of: 7/15/18 6:51 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-n73e Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0957

Public comment 563. Individual. Mary Kennedy. 7-6-18

Submitter Information

Name: mary Kennedy

General Comment

We need as many boundaries as we can get on our gun laws period. Get nra out if politics.

PUBLIC SUBMISSION

As of: 7/15/18 6:50 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-wtg9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0956

Public comment 564. Individual. Avis Ogilvy. 7-6-18

Submitter Information

Name: Avis Ogilvy

Address:

New Orleans, LA, 70118

Email: lanivet@gmail.com

Phone: 5048610849

Organization: Friends of the Earth

General Comment

Please leave the management of gun export the way it is. You don't have to do EVERYTHING the gun lobby tells you to do.

PUBLIC SUBMISSION

As of: 7/15/18 6:48 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-zluq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0955

Public comment 565. Individual. Janie Dobbs. 7-6-18

Submitter Information

Name: Janie Dobbs

Address:

3440 Vermont Place

Pleasanton, 94588

Email: janie.dobbs@aol.com

Phone: 9254265069

General Comment

I am against moving the oversight of gun exports to the commerce department for these reasons:

- 1) It would end the State Departments ability to prevent high-risk transfers of arms.
- 2) It would compromise the United States ability to investigate and prosecute arms smugglers.
- 3) It would make it easier for U.S. firearms to reach terrorists, criminal organizations and corrupt and abusive foreign security forces.
- 4) It would erode existing global norms on firearms exports.
- 5) There are no public end-use reports on arms exports authorized by the Commerce Department such as those for exports authorized by the State Department. So, virtually the U. S. would be unable to identify key trafficking patterns that can help avoid risky arms transfers.

PUBLIC SUBMISSION

As of: 7/15/18 6:47 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-324y Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0954

Public comment 566. Individual. Hannah Pierson. 7-6-18

Submitter Information

Name: Hannah Pierson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The world needs less guns. Less death and violence.

PUBLIC SUBMISSION

As of: 7/15/18 6:45 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-po1s Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0953

Public comment 567. Individual. Kenneth Hyche. 7-6-18

Submitter Information

Name: Kenneth Hyche

General Comment

Stop the gun sales of assault weapons and bumpstocks everywhere. Do not allow the pro-massacre organization the NRA to export this terror all over the world.

PUBLIC SUBMISSION

As of: 7/15/18 6:43 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-p6u6 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0952

Public comment 568. Individual. Melanie Roth-Smith. 7-6-18

Submitter Information

Name: Melanie Roth-Smith

Address:

50 Pickering st

Danvers, MA, 01923

Email: Mel8roth@hotmail.com

General Comment

We have a gun violence epidemic in our country. The time has been long overdue to finally take action. I urge you to fully fund and support gun control measures and research.

PUBLIC SUBMISSION

As of: 7/15/18 6:42 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-9vip
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0951

Public comment 569. Individual. Jan Slavid. 7-6-18

Submitter Information

Name: Jan Slavid

Address:

841 Montecillo Rd.
San Rafael, CA, 94903

Email: jan@relewis.com

Phone: 4158196670

General Comment

I oppose the rule change that would switch the regulation of firearms being exported from the U.S. State Department to the U.S. Commerce Department

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security

I believe in gun control, here and in other countries, especially control of assault weapons.

PUBLIC SUBMISSION

As of: 7/15/18 6:41 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944o-wp8a Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0950

Public comment 570. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Firearms, Guns, Ammunition and Related Articles highly impact the safety of every person in the United States and around the world. The sale of weapons must be carefully controlled for the security of our citizens and our nation. Arming the countries that do not have strict gun control laws in place will result in truly putting guns in the hands of bad people. This change should not be made.

PUBLIC SUBMISSION

As of: 7/15/18 6:39 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944o-zoy8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0949

Public comment 571. Individual. Kathryn De Muth. 7-6-18

Submitter Information

Name: Kathryn De Muth

General Comment

Guns do kill people. I hate the saying, Guns do not kill people, people kill people The saying is ludicrous. The guns are a very effective medium to kill.

PUBLIC SUBMISSION

As of: 7/15/18 6:38 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944p-73sa
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0948

Public comment 572. Individual. Ken Box. 7-6-18

Submitter Information

Name: Ken Box

Address:

Austin, TX, 78703

Email: kbox7@austin.rr.com

Phone: 5124739936

Organization: Austin Community College

General Comment

The quickest way to poison a society and undermine all police departments, add more guns.

PUBLIC SUBMISSION

As of: 7/15/18 6:37 AM
Received: July 06, 2018
Status: Posted
Posted: July 15, 2018
Tracking No. 1k2-944p-18rb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0947

Public comment 573. Individual. Tim Woolsey. 7-7-18

Submitter Information

Name: Tim Woolsey

General Comment

Is this really a good way to export American values around the world?

Isn't this just yet another result of powerful lobbying activities by gun manufacturers to increase sales?

What possible good can come of this other than increasing the profits of the gun industry?

Wouldn't it be better to promote American values in the form of diplomacy, educational exchanges, artistic exchanges?

We should be making it more difficult to obtain these weapons rather than easier if we are truly interested in a more peaceful world.

PUBLIC SUBMISSION

As of: 7/15/18 6:35 AM Received: July 06, 2018 Status: Posted Posted: July 15, 2018 Tracking No. 1k2-944p-lxjn Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0946

Public comment 574. Individual. Geraldine Mueller. 7-6-18

Submitter Information

Name: Geraldine Mueller

General Comment

That is a ridiculous precedent. More guns means more mass killings. Less rules makes it easier to buy a gun, encourages the NRA, encourages more deaths in a country that leads the world on mass murders. What we really need is stronger gun control, a waiting time before buying a gun, stricter registration, etc. please do not do this.

PUBLIC SUBMISSION

As of: 7/14/18 11:33 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-m99o Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0945

Public comment 575. Individual. Chantal Hoey-Sanders. 7-6-18

Submitter Information

Name: Chantal Hoey-Sanders

Address:

567 Prestwick Ave SE

Grand Rapids, MI, 49546

Email: Chantahoey@hotmail.com

Phone: 6164581499

General Comment

This is absolutely greedy and absurd. #NotmyAmerica

PUBLIC SUBMISSION

As of: 7/14/18 11:32 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-ju2l
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0944

Public comment 576. Individual. Adair DeLamater. 7-6-18

Submitter Information

Name: Adair DeLamater

Address:

44 East Milan Street

Bath, ME, 04530

Email: adairdelamater@gmail.com

Phone: 2073894488

Organization: N/A

General Comment

This proposed rule would just increase the horror of more weapons of destruction spreading around the world. Another idea to make the rich richer, without regard to the consequences for the rest of life on Earth. The system is not broken, so don't fix it.

PUBLIC SUBMISSION

As of: 7/14/18 11:30 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-emu1 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0943

Public comment 577. Individual. Linda Zawrotniak. 7-6-18

Submitter Information

Name: Linda Zawrotniak

General Comment

I oppose the switch of firearm sales regulation to the Commerce Department. National security requires that the State Department retain jurisdiction. The Commerce Department is only concerned with sales and doesn't have the focus on geopolitical issues that is needed.

PUBLIC SUBMISSION

As of: 7/14/18 11:29 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-5ngy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0942

Public comment 578. Individual. Philip Yokers. 7-6-18

Submitter Information

Name: Philip Yokers

Address:

5108 NE 72nd Circle

Vancouver, WA, 98661

Email: pkyo@aol.com

Phone: 503-720-9009

General Comment

I oppose re-classifying these regulated weapons from where they are now: "military", under export regulation by the State Department, to the regulation by the Commerce Department. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. That means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. As "military", these regulated weapons are under the regulation of the State Department, and Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place:

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a

3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/14/18 11:28 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-jh14
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0941

Public comment 579. Individual. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are not "commerce." They are weapons and should be heavily regulated.

PUBLIC SUBMISSION

As of: 7/14/18 11:26 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-njk8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0940

Public comment 580. Individual. Leslie Oelsner. 7-6-18

Submitter Information

Name: Leslie Oelsner

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This seems obviously to gravely threaten our national security -- it certainly gives terrorists even more chance to amass deadly firearms.

PUBLIC SUBMISSION

As of: 7/14/18 11:25 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-q3jf Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0939

Public comment 581. Individual. Ruth VLd. 7-6-18

Submitter Information

Name: Ruth VLd

General Comment

Insane policies bring more violence. We hVe enough already

PUBLIC SUBMISSION

As of: 7/14/18 11:24 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-dgox Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0938

Public comment 582. Individual. Moira McKinnon. 7-6-18

Submitter Information

Name: Moira McKinnon

Address:

5 Gale Road

Hampton, NH, 03842

Email: moira.mckinnon@gmail.com

Phone: 6036016225

General Comment

The rest of the world thinks that the United States is absolutely insane to live with our out-of-control, deadly gun culture. The proposed rule aims to spread our poisonous violence to the rest of the world. I am absolutely opposed, as a mother and a teacher.

PUBLIC SUBMISSION

As of: 7/14/18 11:23 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-5itm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0937

Public comment 583. Individual. Kelly Henderson. 7-6-18

Submitter Information

Name: Kelly Henderson

General Comment

I oppose this rule change because it would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 11:21 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-8kzq Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0936

Public comment 584. Individual. Daniel Dayton. 7-6-18

Submitter Information

Name: Daniel Dayton

Address:

Bensalem, PA, 19020

Email: danielayton19020@yahoo.com

Phone: 2156383622

General Comment

i strongly oppose the transfer of firearms export licenses from state to commerce, this would be against best interests of the usa

PUBLIC SUBMISSION

As of: 7/14/18 11:20 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-abv2 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0935

Public comment 585. Individual. Elise Margulis. 7-6-18

Submitter Information

Name: Elise Margulis

General Comment

Stop the opening of new floodgates for gun sales!

PUBLIC SUBMISSION

As of: 7/14/18 11:18 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-ynt7 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0934

Public comment 586. Individual. Wendy Stevens. 7-6-18

Submitter Information

Name: Wendy Stevens

Address:

7024 Hidden Creek Dr
Charlotte, NC, 28214

Email: wagothro@hotmail.com

Phone: 4254882348

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We already have enough guns that we sold to other governments and persons that are now being used against us. Wake up, make it harder not easier.

PUBLIC SUBMISSION

As of: 7/14/18 11:17 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-t1st Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0933

Public comment 587. Individual. Natalie Pargas. 7-6-18

Submitter Information

Name: Natalie Pargas

Address:

1055 Gun Club Rd
Palmerton, PA, 18071

Email: npargas@aol.com

Phone: 2024898947

General Comment

I do not understand when much of our economic and immigration and military membership is based on "national security" how broadening sales to countries and persons outside the United States preserves and protects our national security. Please explain. Natalie Pargas

PUBLIC SUBMISSION

As of: 7/14/18 11:14 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-9r2i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0932

Public comment 588. Individual. Sharon Baker. 7-6-18

Submitter Information

Name: Sharon Baker

General Comment

U.S. firearms exported to Mexican police have been used in massacres and forced disappearances. We need international background checks to prevent gun exports to military and private groups that use them to commit violence or collude with organized crime.

At the core of these proposed changes is the mistaken belief that firearms do not merit tighter control because they are neither high-tech nor provide unique military advantages. In reality, these are some of the weapons most often used to commit abuses and extend conflict around the world. As such they deserve our highest scrutiny, not an easier path for sale and one without Congressional oversight. The policy continues the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

"The Trump administration's decision to relax regulations on the export of firearms will make it easier for terrorists, tyrants and criminal gangs to get their hands on the same dangerous firearms that have been used in mass shootings in the United States. This is a victory for the NRA and the gun industry and a loss for everyone else. Relaxing regulations on many firearms by putting them under the jurisdiction of the Commerce Department rather than the Department of State will make it harder to track where these weapons end up, and therefore easier for them to be diverted into the wrong hands. To make matters worse, Congress would no longer even be notified of major firearms exports, making it harder to do things like limit sales to the police in the Philippines who have been involved in assassinations of their own citizens -- as Sen. Ben Cardin, who blocked such sales in the past, has noted.

O, let America be America again --
The land that never has been yet --
And yet must be -- the land where every [one] is free.
Langston Hughes, Let America Be America Again

PUBLIC SUBMISSION

As of: 7/14/18 11:11 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-xycd Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0931

Public comment 589. Individual. Vincent Bergan. 7-6-18

Submitter Information

Name: Vincent Bergan

Address:

45-1043 Pahuwai Pl
Kaneohe, HI, 96744

Email: vbergan@gmail.com

Phone: 8084697495

Fax: 96744

General Comment

As a US citizen I am opposed to the new regulations which make it easier to sell high tech American made weapons overseas. It is dangerous because those weapons could easily get into the wrong hands and be used against Americans.

PUBLIC SUBMISSION

As of: 7/14/18 11:09 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-ggwm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0929

Public comment 591. Individual. Matthew Genaze. 7-6-18

Submitter Information

Name: Matthew Genaze

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Guns are an epidemic. Guns are a daily act of terrorism. Guns are a direct threat to our democracy. These facts require direct and significant action immediately. I am only able to support legislators and the parties they are members of that support aggressive gun regulation legislation.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 11:08 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-wlbh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0928

Public comment 592. Individual. Marilyn Long. 7-6-18

Submitter Information

Name: Marilyn Long

Address:

6812 E 123rd Ter

Grandview, MO, 64030

Email: mjanelong@aol.com

Phone: 8167613492

Fax: 64030

General Comment

What this country needs is not easier to obtain and more widely available guns We need to have stricter background check regulations, not just for gun stores but for on-line sales and gun shows. We need to keep assault-style weapons out of the hands of non-military, non-law enforcement people. No one needs such weapons for hunting or self-defense. I know it would be impossible to get all of these weapons off the streets but other countries have drastically reduced their prevalence by such things as buy-back programs.

PUBLIC SUBMISSION

As of: 7/14/18 11:06 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-nozn Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0927

Public comment 593. Individual. Rachel Butler. 7-6-18

Submitter Information

Name: Rachel Butler

Address:

Seattle, WA, 98199

Email: rachelnbutler@gmail.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is yet another example of the disturbing amount of influence the NRA has on policy.

PUBLIC SUBMISSION

As of: 7/14/18 11:05 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-ljk5 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0926

Public comment 594. Individual. Frances Hugg. 7-6-18

Submitter Information

Name: frances hugg

Address:

777 Liberty Lane

Hollidaysburg, PA, 16648

Email: franceshugg777@gmail.com

Phone: 814-695-1758

General Comment

The greedy NRA wants to spread our gospel of guns to places outside of the US and infect their homicidal lust for violence, death and mayhem on other societies now? Their filthy obsession for profit knows no bounds! No-- no laws should be changed to allow their anti-Christian spread of violence over the entire earth! Isn't it bad enough that we have our children going to schools where they are sitting ducks in the NRA shooting gallery-- must we export death now?

PUBLIC SUBMISSION

As of: 7/14/18 11:03 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-vplx Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0925

Public comment 595. Individual. Celeste Leibowitz. 7-6-18

Submitter Information

Name: Celeste Leibowitz

General Comment

Do not facilitate the expanded proliferation of firearms by shifting control of their export to the Department of Commerce. To do so puts even more lives at risk.

PUBLIC SUBMISSION

As of: 7/14/18 11:00 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944p-nx6s Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0924

Public comment 596. Individual. Blanca Guillen-Woods. 7-6-18

Submitter Information

Name: Blanca Guillen-Woods

General Comment

Given the recent gun violence, we need stronger and increased controls not less and safety need to be a higher priority.

PUBLIC SUBMISSION

As of: 7/14/18 10:59 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944p-5kkn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0923

Public comment 597. Individual. Mary White. 7-6-18

Submitter Information

Name: Mary White

General Comment

I oppose transferring authority to regulate firearms like semi-automatic weapons from the State Department to the Commerce Department. Commerce is concerned with promoting American business of whatever kind, not in asking whether its in our national interest for particular countries or buyers to be able to obtain such weapons.

PUBLIC SUBMISSION

As of: 7/14/18 10:58 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-92qx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0922

Public comment 598. Individual. Christa Shulters. 7-6-18

Submitter Information

Name: Christa Shulters

General Comment

All firearms are weapons, and should therefore be regulated by a governing body concerned with safety. To falsely label guns as regular commercial goods will put even more people's lives in jeopardy. This proposed rule change is morally and ethically wrong, and should be discarded immediately.

PUBLIC SUBMISSION

As of: 7/14/18 10:56 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-rq6u
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0921

Public comment 599. Individual. Douglas Estes. 7-6-18

Submitter Information

Name: Douglas Estes

Address:

629 Arguello Blvd. #303

San Francisco, CA, 94118

Email: dce005@yahoo.com

General Comment

Arms sales of all types must be reduced if humanity and civilization are to survive. I am opposed to this rule and this blatant attempt to further enrich gun manufacturers and investors.

PUBLIC SUBMISSION

As of: 7/14/18 9:43 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-b38q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0920

Public comment 600. Individual. Stefanie Kaku. 7-6-18

Submitter Information

Name: Stefanie Kaku

General Comment

I oppose a rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

We dont know where those firearms might end up. This increases risks to our national security.

PUBLIC SUBMISSION

As of: 7/14/18 9:41 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-5iuv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0919

Public comment 601. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I am concerned that such a change will have serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/14/18 9:39 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-lcu6 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0918

Public comment 602. Individual. John Cooper. 7-6-18

Submitter Information

Name: John Cooper

Address:

36 N 7th St.

Lewisburg, PA, 17837

Email: jcooper@bucknell.edu

Phone: 5705236059

Organization: Service Electric

General Comment

There is NO excuse, repeat NO EXCUSE, for selling weapons of mass assassination to civilians.

PUBLIC SUBMISSION

As of: 7/14/18 9:37 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-vsqt
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0917

Public comment 603. Individual. Samantha Blanchard. 7-6-18

Submitter Information

Name: Samantha Blanchard

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I believe such an action would make us less safe, and less secure.

PUBLIC SUBMISSION

As of: 7/14/18 9:36 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-4rvk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0916

Public comment 604. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Keep the oversight of commercial firearm exports with the U.S. Department of State.

Transferring responsibility for reviewing licenses to export certain types of weapons including assault-style rifles and pistols and armor-piercing sniper rifles away from the State Department would make it easier for U.S. firearms and related ammunition to reach terrorists, criminal organizations and corrupt and abusive foreign security forces.

PUBLIC SUBMISSION

As of: 7/14/18 9:34 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-sa2t Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0915

Public comment 605. Individual. Arlene Renshaw. 7-6-18

Submitter Information

Name: Arlene Renshaw

Address:

216 Locke St.
Mankato, MN, 56001

Email: arlenerenshaw@yahoo.co.uk

Phone: 507-387-5329

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department as the change could pose serious threats to national security.

PUBLIC SUBMISSION

As of: 7/14/18 9:33 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-b4y5 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0914

Public comment 606. Individual. Barbara Khajavi. 7-6-18

Submitter Information

Name: Barbara Khajavi

Address:

5669 Pope Ave

Steele, AL, 35987-2951

Email: labamagirl64@gmail.com

Phone: 2565385465

Fax: 35987-2951

General Comment

Shame on anyone that has the power to do something about the gun selling and manufacturing but doesn't. There are too many people killed by gun violence.

PUBLIC SUBMISSION

As of: 7/14/18 9:31 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-r379
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0913

Public comment 607. Individual. Karen D Amato. 7-6-18

Submitter Information

Name: Karen D'Amato

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This amounts to a move from guns for national security to guns as international business. Guns should only be used by armed forces during a direct attack and should only be sold for the purpose of protecting our nation. Individuals are less safe because of the people's right to bear arms. American gun manufacturers should stop selling guns to our citizens and to other countries for their profit alone. People should come before profits. And war needs to stop being a business venture.

PUBLIC SUBMISSION

As of: 7/14/18 9:23 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-tu11
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0912

Public comment 608. Individual. Kathryn Davidson. 7-6-18

Submitter Information

Name: Kathryn Davidson

Address:

6704A Fort Davis Cv
Austin, TX, 78731

Email: kathryn@clan-davidson.com

Phone: 5123380333

General Comment

This action Eliminates Congressional oversight for important gun export deals. Very bad idea. It Transfers the cost of processing licenses from gun manufacturers to taxpayers. Bad idea for taxpayers. This Removes statutory license requirements for brokers, increasing risk of trafficking. Bery stupid idea. It also Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating regulation .Dumb move.

PUBLIC SUBMISSION

As of: 7/14/18 9:21 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-d82n Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0911

Public comment 609. Individual. Harvey Eisen. 7-6-18

Submitter Information

Name: Harvey Eisen

General Comment

This is crazy! Guns are the ubiquitous in our society and there are way too many homicides and suicides as a result. Please vote against this measure.

PUBLIC SUBMISSION

As of: 7/14/18 9:20 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-cx3s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0910

Public comment 610. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I oppose this change that would switch regulations of firearms export from U.S. State Dept. to the U.S. Commerce Dept. Please keep our country and our children safe with common sense about what what's really important and what real human rights are worth fighting for - "life, liberty, and the pursuit of happiness" does not coincide with worries for safety from increased national and international gun sales.

PUBLIC SUBMISSION

As of: 7/14/18 9:18 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-ap5b
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0909

Public comment 611. Individual. Tom Sharkey. 7-6-18

Submitter Information

Name: Tom Sharkey

Address:

2 Arrowwood Court
Granby, CT, 06035

Email: tbshar49@sbcglobal.net

General Comment

I strongly oppose this export rule change from the Department of State to the Dept. of Commerce. This move on the part of Trump is a glaring example of his unwholesome intentions regarding an already extremist gun culture in the US. i have always thought that Trump will eventually mobilize his base to begin his American style pogrom to facilitate nationwide terror and a state of authoritarian tyranny.

Not only does this sinister change in the status of munitions under the United States Munitions List deeply concern me but also the reality that there are already far too many guns in the hands of those who should not have them especially given the huge numbers of suicide by firearms on a yearly basis and the almost daily mass shootings occurring everywhere in the US.

PUBLIC SUBMISSION

As of: 7/14/18 9:17 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944q-nn7s
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0908

Public comment 612. Individual. Cristin Jones. 7-6-18

Submitter Information

Name: Cristin Jones

General Comment

Making more guns more readily available is not a solution to Americas gun epidemic. We need real change and innovative thinking to help.

PUBLIC SUBMISSION

As of: 7/14/18 9:15 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-3p5o Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0907

Public comment 613. Individual. Donna Shuey. 7-6-18

Submitter Information

Name: Donna Shuey

General Comment

I generally oppose regs that would make it easier to export guns from the US so I oppose any changes to current rules and regs.

Ex, Congress no longer being notified about large weapons sales is not acceptable.

The changes would present fewer obstacles for crime organizations to purchase large caches of weapons.

Removing liscensing requirements is also a problem in my opinion.

None of the rule changes are acceptable and I urge you to oppose them.

Thank you

PUBLIC SUBMISSION

As of: 7/14/18 9:14 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-ho7l Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0906

Public comment 614. Individual. Cynthia Tobey Klein. 7-6-18

Submitter Information

Name: Cynthia Tobey Klein

General Comment

What the World needs now is fewer guns !! Stop the Spread !!

PUBLIC SUBMISSION

As of: 7/14/18 9:03 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-wwpd Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0905

Public comment 615. Individual. Sylvia De Baca. 7-6-18

Submitter Information

Name: Sylvia De Baca

Address:

San Dimas, CA, 91773

Email: sylviaadeba@verizon.net

Phone: 9515052203

General Comment

I believe gun ownership needs warranted control in the United States. This is not the wild west and how many guns does one person need. We are killing our population and innocent citizens. Everyone talks about the mentally ill and guns. Everyone is sane until they are insane. Sane people buy the guns and then some event in their life happens and makes them insane and they have guns and decide to go do a shoot up of innocent people. A sane person with a gun does not make it any safer. I implore you to seriously think about and continue to control firearms, guns, ammunition and related articles under the United States Munitions List.

PUBLIC SUBMISSION

As of: 7/14/18 9:01 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944q-wshs Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0904

Public comment 616. Individual. Jennifer Valentine. 7-6-18

Submitter Information

Name: jennifer valentine

General Comment

We need MAJOR increases in gun control!

PUBLIC SUBMISSION

As of: 7/14/18 9:00 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-ebgm Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0903

Public comment 617. Individual. Lesley Hunt. 7-6-18

Submitter Information

Name: Lesley Hunt

Address:

236 Warwick Dr.

Walnut Creek, CA, 94598

Email: ldhunt@astound.net

General Comment

I oppose this rule change that would move the regulation of firearms exports from the State Department to the Commerce Department. The sale of guns to businesses or governments in other countries is the proper concern of the State Department because it is a national security issue. The Commerce Department is going to look at it from a business point of view. Profit is not everything. I do not want US arms companies to sell weapons of any sort to governments or groups that are unfriendly to us.

PUBLIC SUBMISSION

As of: 7/14/18 8:58 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-dxup Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0902

Public comment 618. Individual. Linda Mansfield. 7-6-18

Submitter Information

Name: Linda Mansfield

Address:

4107

Lynn Rd.

Ravenna, OH, 44266

Email: lmansfield7@neo.rr.com

Phone: 3302353404

Fax: 44266

General Comment

We need gun control. Universal back ground checks, ban assault weapons & bump stocks,ban guns for people with mental illness, on the no fly list,domestic violence, ban guns sold at a gun show or over the internet without a back ground check.

PUBLIC SUBMISSION

As of: 7/14/18 8:57 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-2f7d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0901

Public comment 619. Individual. Carmen Nichols. 7-6-18

Submitter Information

Name: Carmen Nichols

General Comment

Guns are dangerous and we all know that in the wrong hands many can die. Stricter gun laws need to be implemented and utilized to keep people safe.

Guns are not safe unless the owners keep them under lock and key. They should never be left out so anyone can get their hands on them to use them for killing.

Lives are so important and guns themselves don't kill, if they are in the wrong hands they can kill anyone and everyone that comes into their view.

The American people want to feel safe and secure. The children are scared to go to school for fear they will never come home to be with their families again.

It's time to make laws that keep American's safe and feel secure where ever they go, and what ever they do, including the children.

It 's time NOW to come together and make life safer and more secure for the American people. Tougher laws are the way to go and what needs to be done.

PUBLIC SUBMISSION

As of: 7/14/18 8:55 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-6jwn Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0900

Public comment 620. Individual. David Kagan. 7-6-18

Submitter Information

Name: David Kagan

Address:

885 Torbert Lane

Jersey Shore, PA, 17740

Email: dbkagan@comcast.net

General Comment

How could any caring human being NOT be in favor of greater controls over guns after all the horrible gun-shootings of the past few years?

PUBLIC SUBMISSION

As of: 7/14/18 8:54 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-1s2q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0899

Public comment 621. Individual. Michelle Mitchell. 7-6-18

Submitter Information

Name: Michelle Mitchell

Address:

17227 Chardonnay Ct
Cornelius, NC, 28031

Email: michelleymitchell@gmail.com

Phone: 7048969629

Fax: 28031

General Comment

As a concerned citizen, I oppose the NRA's push to move export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. I believe this transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Right now, firearms exports are classified as military", which allows Congress to block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. In addition, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Finally, this rule change would eliminate some very important State Department programs, including; the State Departments Blue Lantern program, the licensing program for brokers, and the block on 3D printing of firearms. The bottom line is that firearms are extremely dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/14/18 8:51 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-mqph Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0898

Public comment 622. Individual. Derek Benedict. 7-6-18

Submitter Information

Name: Derek Benedict

General Comment

We don't need ordinary citizens to be armed with assault weapons and bumpstocks. I'm a supporter of the 2nd Amendment's right of a "well regulated militia", but firearms in the hands of irresponsible people is not what our forefathers intended.

PUBLIC SUBMISSION

As of: 7/14/18 8:42 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-goxz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0897

Public comment 623. Individual. Melissa Sanford. 7-6-18

Submitter Information

Name: Melissa Sanford

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Exporting items intended to kill human beings to other countries requires the oversight of the Department charged with understanding other nations and cultures, not the Department charged with selling whatever the market will bear. Arming foreign people without understanding the consequences to them and us is an appallingly poor policy.

PUBLIC SUBMISSION

As of: 7/14/18 8:41 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-b4y9 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0896

Public comment 624. Individual. Ann Prentice. 7-6-18

Submitter Information

Name: Ann Prentice

Address:

414 Savannah Barony Drive
North Augusta, SC, 29841

Email: APrentice@osh.org

Phone: 803-624-3044

General Comment

I believe this to be not only unethical and immoral but outrageous and obscene!

PUBLIC SUBMISSION

As of: 7/14/18 4:42 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-zvnc
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0895

Public comment 625. Individual. Patricia Long. 7-6-18

Submitter Information

Name: Patricia Long

Address:

2034 columbia blvd.

PMB 501

Saint Helens, OR, 97051

Email: sallyforth00@yahoo.com

General Comment

Let's do things right this time around!

PUBLIC SUBMISSION

As of: 7/14/18 4:41 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-n2mg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0894

Public comment 626. Individual. Ann Bley. 7-6-18

Submitter Information

Name: Ann Bley

Address:

1184 Clouds Rest Point

Mesquite,

Email: Abley@prodigy.net

Phone: 7026134104

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it will result in the unnecessary marketing of firearms by the US govt. There are already too many firearms in the world as it is. I dont believe the firearm industry needs any support from the US govt to market firearms especially in light of the fact that this industry has been instrumental in blocking any legislation to protect US citizens from the misuse of firearms for violenc.

PUBLIC SUBMISSION

As of: 7/14/18 4:39 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-is09
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0893

Public comment 627. Individual. Kraig and Valerie Schweiss. 7-6-18

Submitter Information

Name: Kraig and Valerie Schweiss

Address:

Sterling, United States, 61081-9517

Email: schweiss@thewisp.net

Phone: 8156259205

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

We VEHEMENTLY OPPOSE the NRA's UNETHICAL and UNCONSCIONABLE rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. To make MONEY from profiting off the military-style weaponry that has KILLED so many innocent MEN, WOMEN, and CHILDREN already in this country and exporting this VIOLENT and MASS- MURDERING MEANS OF DEATH and DESTRUCTION ABROAD is BEYOND SENSIBLE! ENOUGH of this MAYHEM and CHAOS of GUNS!

PUBLIC SUBMISSION

As of: 7/14/18 4:37 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-vu30
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0892

Public comment 628. Anonymous. 7-6-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Please do not put the sale of guns in an easy access situation with no oversight and regulation. I am very concerned that unregulated sales are going to kill more people than ever, especially in the U.S., where gun violence is very high. As a grandmother, I can tell you that our grandchildren don't feel safe in school. Don't let the NRA become even more powerful. They only care about power and money, not our rights to be safe.

PUBLIC SUBMISSION

As of: 7/14/18 4:35 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-2tck Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0891

Public comment 629. Individual. Corinne Dodge. 7-6-18

Submitter Information

Name: CORINNE DODGE

General Comment

More than ever we NEED control of firearms, guns and ammunition. The growing gun violence in our country is unconscionable, and our US government must take responsibility for controlling it. Do NOT TAKE THOSE ITEMS OFF THE US MUNITIONS LIST.

PUBLIC SUBMISSION

As of: 7/14/18 4:34 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-j5ui
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0890

Public comment 630. Individual. Sam Tamoglia. 7-6-18

Submitter Information

Name: Sam Tamoglia

Address:

460 Quass Road

Robins, IA, 52328

Email: sam.Tamoglia@yahoo.com

Phone: 3192413674

General Comment

We don't need to repeal the second amendment but the mass shootings happen to freaquently.

PUBLIC SUBMISSION

As of: 7/14/18 4:32 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-uqfx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0889

Public comment 631. Individual. Doug Randolph. 7-6-18

Submitter Information

Name: Doug Randolph

Address:

640 Sunny Glen Ct
Woodland Park, CO, 80863

Email: drandolph2@aol.com

Phone: 7196847770

General Comment

I absolutely oppose a rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. That would be an absurd and dangerous thing to do to promote more firearms worldwide.

PUBLIC SUBMISSION

As of: 7/14/18 4:30 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-50e4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0888

Public comment 632. Individual. Jayne Nash. 7-6-18

Submitter Information

Name: Jayne Nash

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Safety is so much more important than corporate greed.

PUBLIC SUBMISSION

As of: 7/14/18 4:29 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-z5w1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0887

Public comment 633. Individual. Alicia Obrien. 7-7-18

Submitter Information

Name: Alicia OBrien

Address:

325 Prospector Avenue
Durango, 81301

Email: apobrien@centurytel.net

Phone: 9709461256

Fax: 81301

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, and damage every U.S. citizen's security abroad as well as put our own national security at risk.

PUBLIC SUBMISSION

As of: 7/14/18 4:28 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-pwra Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0886

Public comment 634. Individual. Hilary Simonetti. 7-7-18

Submitter Information

Name: Hilary Simonetti

General Comment

Any increase in gun sales means the end of our nation. NO on guns, period

PUBLIC SUBMISSION

As of: 7/14/18 4:26 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-fdms
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0885

Public comment 635. Individual. Anne Bucher. 7-7-18

Submitter Information

Name: Anne Bucher

General Comment

Keep guns off the street! it is making our country unsafe!!!

PUBLIC SUBMISSION

As of: 7/14/18 4:25 PM
Received: July 06, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944r-y2fd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0884

Public comment 636. Individual. Marianne Flanagan. 7-7-18

Submitter Information

Name: Marianne Flanagan

General Comment

Weapons and weapons of war are not commerce items. but items used expressly for injuring and killing. As such they do not belong under the jurisdiction of the commerce department. Just because the NRA and gun lobby want something doesn't mean they should have it.

PUBLIC SUBMISSION

As of: 7/14/18 4:24 PM Received: July 06, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944r-z9ik Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0883

Public comment 637. Individual. Carol Fabitz. 7-7-18

Submitter Information

Name: Carol Fabitz

Address:

760 Chief Kewaskum Pl.
Kewaskum, WI, 53040

Email: dindy1944@yahoo.com

General Comment

I see this action as more money for the Republican coffers. The United States is ruined do ruin the rest of the world.

You people make my skin crawl.

PUBLIC SUBMISSION

As of: 7/14/18 4:23 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-d6hu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0882

Public comment 638. Individual. Joseph Homstad. 7-7-18

Submitter Information

Name: Joseph Homstad

Address:

4402 Markle Road

#14

La Crosse, WI, 54601

Email: joseph_homstad@yahoo.com

Phone: 6087385223

General Comment

The U.S. State Department must retain this authority. Gun violence is rampant enough in this country. An unwise move like this one is exactly what the NRA wants. Do not shift this responsibility to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 4:07 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-r5e7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0881

Public comment 639. Individual. David Dougherty. 7-7-18

Submitter Information

Name: David Dougherty

General Comment

We need more guns on the streets & in the hands of the mentally ill like we need terminal stage 4 cancer

PUBLIC SUBMISSION

As of: 7/14/18 4:06 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-vxon
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0880

Public comment 640. Individual. Herman Whiterabbit. 7-7-18

Submitter Information

Name: Herman Whiterabbit

General Comment

Nothing good ever comes from constant gunplay.

PUBLIC SUBMISSION

As of: 7/14/18 4:04 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-uzbh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0879

Public comment 641. Individual. Karen Ives. 7-7-18

Submitter Information

Name: Karen Ives

General Comment

There is a reason - both national security AND protection of our troops abroad - for having control of exporting arms in the State Department. Having in the Commerce allows business interests to rule. The last thing we need is U.S. manufactured arms used against Americans and our allies. Use your common sense - not greed!

PUBLIC SUBMISSION

As of: 7/14/18 4:03 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-ieta
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0878

Public comment 642. Individual. Laurie Dils. 7-7-18

Submitter Information

Name: Laurie Dils

General Comment

Transferring the regulation of overseas firearms sales to the Commerce Department would seriously undermine US security. I oppose this regulatory change.

PUBLIC SUBMISSION

As of: 7/14/18 4:02 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944s-rqze Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0877

Public comment 643. Individual. Kyra Humphrey. 7-7-18

Submitter Information

Name: Kyra Humphrey

Address:

53 Sunny View Drive

Sequim, WA, 98382-7282

Email: badgermum@gmail.com

Phone: 3607756231

General Comment

This rule change moves the handling of firearms away from an institution which exists to safeguard our nation into the hands of one whose purpose is to promote American business. It poses a serious threat to national and personal security: the Dept. Of Commerce is woefully inappropriate for serving in this capacity.

PUBLIC SUBMISSION

As of: 7/14/18 3:59 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-eo2f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0876

Public comment 644. Individual. Mary Junek. 7-7-18

Submitter Information

Name: Mary Junek

General Comment

The selling and buying of automatic and semiautomatic weapons should not be a business but should be controlled. How can we let this become a common business while distributing these weapons world wide. We already have a huge problem of control of these weapons in the United States. All we need to do is look at all the shootings in this year alone to see that there is no need for military type weapons sold to whoever wants one. Why spread such pain to other countries? Please, no more easy to obtain tactical weapons. Thank You.

PUBLIC SUBMISSION

As of: 7/14/18 3:58 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944s-alx9 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0875

Public comment 645. Individual. Lynette Lowe. 7-7-18

Submitter Information

Name: Lynette Lowe

Address:

2604 Melrose Ave #1

Cincinnati, OH, 45206

Email: lynmariel@gmail.com

Fax: 45206

General Comment

We need common-sense gun regulations, not a flood of new gun sales.

PUBLIC SUBMISSION

As of: 7/14/18 3:57 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-uh8y
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0874

Public comment 646. Individual. Betsy Maestro. 7-7-18

Submitter Information

Name: Betsy Maestro

General Comment

I object to this change as it emphasizes gun sales as solely business related as opposed to taking a more responsible position by keeping the sale of firearms controlled for both moral and security concerns. Do not approve this change.

PUBLIC SUBMISSION

As of: 7/14/18 3:55 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-rb3d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0873

Public comment 647. Individual. Patricia Always. 7-7-18

Submitter Information

Name: Patricia Always

General Comment

Evidence exists that guns are in the hands of the wrong people. The mass shootings that have happened in the last years is indicative of problems with control of guns, and particularly assault weapons. The need for these weapons is very limited and nearly never called for. These weapons create problems rather than addressing them or solving them.

PUBLIC SUBMISSION

As of: 7/14/18 3:54 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-bhys
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0872

Public comment 648. Individual. Trina Hawkins. 7-7-18

Submitter Information

Name: Trina Hawkins

Address:

4115 Davis Ave

Sioux City, 51106

Email: lilbit362436@yahoo.com

Phone: 7122760160

Fax: 51106

General Comment

We Need STRONGER Gun Control!! Too many people are being Killed every day by Guns!! This has to STOP !!

PUBLIC SUBMISSION

As of: 7/14/18 3:51 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-lrwb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0871

Public comment 649. Individual. Ronald Lynn White. 7-7-18

Submitter Information

Name: Ronald Lynn White

Address:

116 Mulberry ST
Lake Jackson, TX, 77566

Email: rwhite9681@comcast.net

Phone: 9792926839

General Comment

Please make sure that the proposed rule change DOES NOT:

Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminate Congressional oversight for important gun export deals.

Transfer the cost of processing licenses from gun manufacturers to taxpayers.

Remove statutory license requirements for brokers, increasing risk of trafficking.

Reduce or eliminate end-use controls, such as State Depts Blue Lantern program, or eliminates registration of firearms exporters.

Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Give the Commerce Department the responsibility to enforce export controls over semi-automatic assault rifles.

Reduce transparency and reporting on gun exports.

Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: 7/14/18 3:49 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944s-5q77
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0870

Public comment 650. Individual. Lynne Eggers. 7-7-18

Submitter Information

Name: Lynne Eggers

General Comment

I oppose this rule change - Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). This change is very unwise in terms of our country's security. It's bad enough that we have so many semiautomatic assault weapons in our country - now we're going to export this problem to other countries? Keep the control in the hands of the U.S. State Department. Isn't security more important than gun sales???

PUBLIC SUBMISSION

As of: 7/14/18 3:48 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-63a1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0869

Public comment 651. Individual. Angela Mogin. 7-7-18

Submitter Information

Name: Angela Mogin

Address:

55 W. 5 Ave., Apt. 5D

Apt. 5D

San Mateo, CA, 94402

Email: amogin45@gmail.com

Phone: 6505136699

Fax: 94402

General Comment

There is no reason to allow gun sales throughout the world. Allowing weapons whose sole purpose is to kill humans to be sent through out the world would further destabilized an unstable world.

PUBLIC SUBMISSION

As of: 7/14/18 3:47 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-9z57
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0868

Public comment 652. Individual. Deborah Parker. 7-7-18

Submitter Information

Name: Deborah Parker

Address:

55 Windward Dr
Bellingham, 98229

Email: firstplanetarian@hotmail.com

Phone: 3606713188

General Comment

I strongly oppose this dangerous proposed rule change, that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Exporting weapons is absolutely a matter of foreign affairs, and national security, rather than a business matter!

PUBLIC SUBMISSION

As of: 7/14/18 3:39 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-4qjx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0867

Public comment 653. Individual. Kathy Smith. 7-7-18

Submitter Information

Name: Kathy Smith

General Comment

Regulation of firearm exports should remain with the State dept. I oppose the rule to move this oversight to the commerce dept.

PUBLIC SUBMISSION

As of: 7/14/18 3:38 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-p28o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0866

Public comment 654. Individual. Reba B. 7-7-18

Submitter Information

Name: Reba B.

General Comment

We must not relax gun control laws any further. Our regulations on firearms are already much too weak, allowing men who should not have access to firearms to purchase them easily to kill their domestic partners or slaughter strangers in public places. Enough!

PUBLIC SUBMISSION

As of: 7/14/18 3:36 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-zhgz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0865

Public comment 655. Individual. Ellis Woodward. 7-7-18

Submitter Information

Name: Ellis Woodward

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department - A land-grab in the name of profit, the rule change would do nothing to improve public safety and would only serve those who are selling firearms in as brazen and unregulated a manner as possible...

PUBLIC SUBMISSION

As of: 7/14/18 3:34 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-yav2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0864

Public comment 656. Individual. Lynn Robertson. 7-7-18

Submitter Information

Name: Lynn Robertson

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It's simply common sense that if a person wants to own a gun, they MUST take gun safety lessons, and they must take shooting classes. The ONLY place that should be ALLOWED to SELL guns, is a gun dealers. NO MORE STOPPING BY AT A GUN SHOW & WALKING OUT WITH A GUN! It's NOT normal!! I am not trying to take away anyone's 2A right. But this random & casual we treat guns MUST STOP!

Do you know that Mexico has only ONE gun shop! ONE!! The US is smuggling guns into Mexico.

PUBLIC SUBMISSION

As of: 7/14/18 3:32 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944t-hww0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0863

Public comment 657. Individual. Michael Madden. 7-7-18

Submitter Information

Name: Michael Madden

General Comment

We desperately need stricter gun control laws. At the very least we need a ban on bump stocks to ensure safety for all Americans.

PUBLIC SUBMISSION

As of: 7/14/18 3:31 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944u-omo1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0862

Public comment 658. Individual. Leah Elkins. 7-7-18

Submitter Information

Name: Leah Elkins

General Comment

This new rule would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international terrorists and criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of the gun industry. I am appalled at this administrations capitulation to the gun lobby which is now turning to the international market as gun sales decline in the US. I am concerned that the proposed rule does not adequately address our national security, foreign policy, international crime and terrorist threats. Congress and the public must be able to understand the impact of these rules on potential firearm exports. The proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: 7/14/18 3:29 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944u-iuy1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0861

Public comment 659. Individual. Laurel Temple. 7-7-18

Submitter Information

Name: Laurel Temple

Address:

10175 SW Katherine St

Tigard, OR, 97223

Email: ltemple07@gmail.com

Phone: 5032681596

General Comment

Control of firearms and munitions need to continue to be controlled to limit the access of weapons to those elements who would use them for nefarious purposes. Also, the proliferation of weapons leads to more violence and death.

PUBLIC SUBMISSION

As of: 7/14/18 3:27 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944u-ry4p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0860

Public comment 660. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

We already have enough guns on the street and in people's bedrooms! Stop the river of death

PUBLIC SUBMISSION

As of: 7/14/18 3:24 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944u-jznl Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0859

Public comment 661. Individual. Nathaniel Watkins. 7-7-18

Submitter Information

Name: Nathaniel Watkins

Address:

Addison, TX, 75001

Email: natejwatkins@gmail.com

Phone: 4252317105

General Comment

I oppose this regulation change. The only parties who stand to benefit are arms manufacturers. Meanwhile, the lax enforcement capabilities of the Department of Commerce will make it easier for US made arms to find their way into the hands of people who would use them against us.

PUBLIC SUBMISSION

As of: 7/14/18 3:27 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944u-jznl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0859

Public comment 661. Individual. Nathaniel Watkins. 7-7-18

Submitter Information

Name: Nathaniel Watkins

Address:

Addison, TX, 75001

Email: natejwatkins@gmail.com

Phone: 4252317105

General Comment

I oppose this regulation change. The only parties who stand to benefit are arms manufacturers. Meanwhile, the lax enforcement capabilities of the Department of Commerce will make it easier for US made arms to find their way into the hands of people who would use them against us.

PUBLIC SUBMISSION

As of: 7/14/18 3:22 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944u-7xrb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0858

Public comment 662. Individual. B.L. Melton. 7-7-18

Submitter Information

Name: B.L. Melton

General Comment

I oppose the proposed change of export licencies from the State Department to the Commerce Department. This transfer includes assault weapons and other powerful firearms and will make it easier to export U.S. guns and ammunition globally. These exported firearms are already being used in crimes, attacks and human rights violations in many other nations.

A change to the Commerce Department will increase the number of export applicants by 10,000 annually, according to the Dept. of Commerce estimates. This change will only benefit the arms business, and cause many more deaths and destruction worldwide.

PUBLIC SUBMISSION

As of: 7/14/18 3:20 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944u-s56z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0857

Public comment 663. Individual. William Schoene. 7-7-18

Submitter Information

Name: William Schoene

Address:

1519 Oak Street

Santa Monica, CA, 90405

Email: williamschoene@gmail.com

Phone: 3104521307

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S.

Commerce Department. What is the purpose of making this change -- the export of many more firearms, including weapons

of mass murder? Isn't it enough that America is drenched in privately-owned guns -- including assault rifles -- and suffers

from the highest rates of gun violence and gun deaths in the world -- by a mile? We want to infect the rest of the world with

our unique kind of insanity? Well I say "NO we do not!"

PUBLIC SUBMISSION

As of: 7/14/18 3:19 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944v-fw18
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0856

Public comment 664. Individual. M. Virginia Leslie. 7-7-18

Submitter Information

Name: M. Virginia Leslie

General Comment

We really, really don't need to add to the supply of arms that are readily available to individuals around the world that mean harm to others, including Americans. Control of Firearms, Guns, Ammunition and Related Articles should stay right where it is.

PUBLIC SUBMISSION

As of: 7/14/18 3:17 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944w-75on
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0855

Public comment 665. Individual. Robert Hall. 7-7-18

Submitter Information

Name: Robert Hall

General Comment

When is the federal government not going to be an instrument of manufacturers of implements for killing humans? Our country afflicted by the insane notion that the more people having guns the better.

I am completely AGAINST our country exporting this madness of free-for-all selling of guns.

Do NOT change the supervision of selling arms abroad from the State Dept. to the Commerce Dept.

PUBLIC SUBMISSION

As of: 7/14/18 3:14 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944w-sd06
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0854

Public comment 666. Individual. Kelly Dalton. 7-7-18

Submitter Information

Name: Kelly Dalton

General Comment

Export licenses of semiautomatic assault weapons and other powerful firearms should be overseen by the State Department, as this is an issue that affects national security.

PUBLIC SUBMISSION

As of: 7/14/18 12:42 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944w-eqz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0853

Public comment 667. Individual. J.T. Smith. 7-7-18

Submitter Information

Name: J.T. Smith

Address:

Sellersville, PA, 18960

Email: ace910046scal@hotmail.com

Phone: 2672814056

General Comment

The sole purpose of a gun is to maim and/or kill at a distance quickly and efficiently. Any argument of what physically does the killing demonstrates a distinct mental disconnect. As such treating what amounts to murder and attempted murder, regardless of the excuse, as a business model is immoral and foolhardy in the extreme. I strongly oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 12:40 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944x-h12m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0852

Public comment 668. Individual. Glenda Adkinson. 7-7-18

Submitter Information

Name: glenda adkinson

General Comment

Guns are NOT making America SAFE.

PUBLIC SUBMISSION

As of: 7/14/18 12:39 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944x-746e Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0851

Public comment 669. Individual. James Shaw. 7-7-18

Submitter Information

Name: James Shaw

General Comment

Guns kill people. Hand guns and assault rifles have no purpose other than to kill people. In most states one can not even purchase fire crackers. Why? Because they are dangerous. Guns are dangerous. Stop the sale of these killing machines.

PUBLIC SUBMISSION

As of: 7/14/18 12:37 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944x-jc33
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0850

Public comment 670. Individual. Ursula Anonymous. 7-7-18

Submitter Information

Name: Ursula Anonymous

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is a horrible idea to export guns to other countries which will definitely come back to haunt us in form of terrorism.

PUBLIC SUBMISSION

As of: 7/14/18 12:36 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944y-1jyf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0849

Public comment 671. Individual. Cheryl Mitchell-Olds. 7-7-18

Submitter Information

Name: Cheryl Mitchell-Olds

General Comment

I am opposed to the rule change that would change the regulations of firearms export from the US State Dept. to the Commerce Dept. The State Dept focuses on safeguarding the nation, selling arms abroad has a huge impact on national security. The violence in Central America is fueled by arms from the US, leading to the flood of refugees on our southern border. The Commerce Dept. only answers to big business, they do not care enough about nation security.

PUBLIC SUBMISSION

As of: 7/14/18 12:32 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944y-21cd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0848

Public comment 672. Moms Rising For Gun Safety. Kevin O Donnell. 7-7-18

Submitter Information

Name: Kevin O'Donnell

Organization: Moms Rising For Gun Safety

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would only increase the possibility of yet more international terrorism.

PUBLIC SUBMISSION

As of: 7/14/18 12:30 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944y-etnz Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0847

Public comment 673. Individual. Karen Mallam. 7-7-18

Submitter Information

Name: Karen Mallam

Address:

Siler City, NC, 27344

Email: karenmallam@yahoo.com

Phone: 9197429953

General Comment

I oppose moving the authority to regulate the export of firearms from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 12:28 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944y-5acv Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0846

Public comment 674. Individual. Steven Salo. 7-7-18

Submitter Information

Name: Steven Salo

Address:

1669 Holly Dr.

McKinleyville, CA, 95519

Email: ssalo2@suddenlink.net

Phone: 7074968610

General Comment

I don't want to see the Commerce Dept. take over regulating arms exports from the State Dept.

PUBLIC SUBMISSION

As of: 7/14/18 12:22 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944y-4928
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0845

Public comment 675. Individual. Angie Anonymous. 7.7.18

Submitter Information

Name: Angie Anonymous

General Comment

I oppose this rule change which would change the regulation of firearms exportation from the State Dept to the Commerce Dept.

PUBLIC SUBMISSION

As of: 7/14/18 12:21 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944z-epzj Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0844

Public comment 676. Individual. Marion Chamberlin. 7-7-18

Submitter Information

Name: Marion Chamberlin

General Comment

This would be a BAD decision and a move in the wrong direction. There is no reason to to promote assault weapons for sale to the general public. Too many shootings!!!! Its time to limit NRAs power and move toward a safe and peaceful environment.

PUBLIC SUBMISSION

As of: 7/14/18 12:20 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944z-cytd Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0843

Public comment 677. Individual. Pam Wallace. 7-7-18

Submitter Information

Name: Pam Wallace

Address:

Greeneville, TN, 37743

Email: wallace2home@yahoo.com

Phone: 8286580273

General Comment

It's time for some adults and common sense! I do not support the NRA or Dana Loesch(?) Second amendment aside, remember Life, Liberty, and the Pursuit of happiness? LIFE IS FIRST!

PUBLIC SUBMISSION

As of: 7/14/18 12:19 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944z-ehmw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0842

Public comment 678. Individual. Valerie Ritter. 7-7-18

Submitter Information

Name: Valerie Ritter

General Comment

I staunchly oppose this proposed rule that guns and ammunition would be under the commerce dept and not the USML. We need to control firearms sale- not promote it. Taxpayers, the US govt. is not working for the NRA. We need to make a better world, not enrich the gun manufacturers & feed the ever growing violence in the world....Be responsible. Have a conscience. Don't gut the world's stability for your profit- all those govt lackeys of the gun manufacturers.

PUBLIC SUBMISSION

As of: 7/14/18 12:17 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944z-kaki
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0841

Public comment 679. Individual. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Guns and their distribution do need regulation in order to promote the general welfare. Helping the gun industry profit from the distribution of death dealing instruments is not the aim of all of this. Strengthen, don't weaken, our already overly liberal gun rules.

PUBLIC SUBMISSION

As of: 7/14/18 12:16 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944z-mjwr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0840

Public comment 680. Individual. Florence Nislow. 7-7-18

Submitter Information

Name: Florence Nislow

General Comment

This move to commerce would increase gun sales;especially assault weapons. Stand with our children and their futures. Say No!

PUBLIC SUBMISSION

As of: 7/14/18 12:08 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944z-uqcn Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0839

Public comment 681. Individual. Andrea Rogers. 7-7-18

Submitter Information

Name: Andrea Rogers

General Comment

I oppose the proposed rule change that would transfer regulation of firearms export from the State Department to the Commerce Department. By making weapons more readily available worldwide, this rule change would put Americans, and people everywhere, at greater risk of violence. The US government should do all within its power to reduce the availability of guns everywhere. This is in our national security interest.

PUBLIC SUBMISSION

As of: 7/14/18 12:06 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944z-vhc3 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0838

Public comment 682. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Guns and ammunitions should not be sold without checks on those using them, especially should not be sold internationally without government approval, as more weapons means more violence.

PUBLIC SUBMISSION

As of: 7/14/18 12:05 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-944z-9gzb Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0837

Public comment 683. Individual. Priscilla Drake. 7-7-18

Submitter Information

Name: Priscilla Drake

General Comment

We need more gun control, not less!!

PUBLIC SUBMISSION

As of: 7/14/18 12:03 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944z-g44d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0836

Public comment 684. Individual. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose changing the export regulation of US firearms from the US State Department to the US Commerce Department!

PUBLIC SUBMISSION

As of: 7/14/18 12:02 PM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-944z-bc8o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0835

Public comment 685. Individual. Heidi Juhl. 7-7-18

Submitter Information

Name: Heidi Juhl

General Comment

The greed of the gun industry, the NRA, and all legislators and agencies who enable them is literally killing Americans. NO Amendment was ever intended to have this result. Stop choosing money over life! No rule that removes guns or accessories from any control list - ALL firearms, guns, and ammo warrant control under Federal lists and regulations.

PUBLIC SUBMISSION

As of: 7/14/18 12:01 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-2bkq Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0834

Public comment 686. Individual. Shannon Maaske. 7-7-18

Submitter Information

Name: Shannon Maaske

General Comment

I oppose the rule change. The Department of Commerce should not be in charge of gun sales and regulations.

PUBLIC SUBMISSION

As of: 7/14/18 12:00 PM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-gl4o Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0833

Public comment 687. Individual. Jennifer Galloway. 7-7-18

Submitter Information

Name: Jennifer Galloway

General Comment

I was raised around guns. Hunting weapons, not weapons of mass destruction! Nobody needs to own assault rifles and the like! Nobody in my family ever killed another human. Let's get the common sense laws passed to do thorough background checks on people who want to buy guns. People can be dangerous!

PUBLIC SUBMISSION

As of: 7/14/18 11:58 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9450-5fdw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0832

Public comment 688. Individual. Brian de Castro. 7-7-18

Submitter Information

Name: Brian de Castro

Address:

34 Mews Lane

South Orange, 07079

Email: bdtrooper@aol.com

Phone: 9737614917

General Comment

With the neverending rash of gun violence in America, like no other country on the planet, the last thing we need is more guns. This is not a mental health issue - other countries have the same percentages of people with mental health concerns but they don't have the gun violence because they don't have the guns. Guns ARE the problem. The NRA wants more guns on the streets and in the hands of everybody because it means more money for them, plain and simple. They promote the proliferation of guns which results in more gun violence. And they're at the point where they are releasing dangerous videos that are meant to incite violence. The NRA has become a terrorist group and needs to be reigned in. If declared a terrorist organization, all of its members could then be banned from owning guns, which would either get rid of a LOT of guns, or else, force members to quit the NRA, effectively shutting them down. It's a win-win. Yes, this is probably nothing but a dream, but so is living in a country where kids don't have to fear being shot going to school or a concert or a movie or church.

Thank you for letting me express my concerns over an issue that must be dealt with besides offering thoughts and prayers. The time to do something, everything, is now.

PUBLIC SUBMISSION

As of: 7/14/18 11:56 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9450-8d2e
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0831

Public comment 689. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

State Department jurisdiction over all firearms is crucial for national security! Get real!! Commerce#!? Do you want more unwarranted shooting !!! Do you think school shootings are a joke#!? NOT FUNNY!!!

PUBLIC SUBMISSION

As of: 7/14/18 11:54 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9450-8j61
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0830

Public comment 690. Individual. Lynn Andrews. 7-7-18

Submitter Information

Name: Lynn Andrews

General Comment

I am all for promoting American businesses and products worldwide. However, I am opposed to efforts to make it easier to export American firearms to foreign countries. American-made weapons are already fueling violence in Mexico and Central America. The more guns we send to our neighbors on our southern border, the more refugees and asylum-seekers will come into our country. Americas gun-related crime problem is not something we should be promoting to other countries.

PUBLIC SUBMISSION

As of: 7/14/18 11:52 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9450-mw12
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0829

Public comment 691. Individual. Dr. Curtiss Durand MD. 7-7-18

Submitter Information

Name: Dr. Curtiss Durand, MD

General Comment

ASSAULT WEAPONS ARE MEANT TO PUT BULLETS INTO YOUR BODY AND MURDER YOU. AND ME. THERE IS NO PLACE ON THIS PLANET FOR SUCH WEAPONS. THIS IS DIFFERENT FROM USING A RIFLE TO HUNT PHEASANTS.

THE SECOND AMENDMENT WAS NOT PUT IN PLACE SO THAT PERSONS CAN HAVE A LETHAL WEAPON IN THEIR HOME. SUCH WEAPONS HAVE ONE MAIN APPLICATION: TO HARM THOSE WHO LIVE IN THE HOME! THEY ARE MUCH MORE LIKELY TO BE USED AGAINST THE PEOPLE WHO OWN THEM AND HAVE THEM IN THEIR HOME THAN AGAINST AN INTRUDER.

A MORE EFFECTIVE WAY TO DEAL WITH INTRUDERS IS THROUGH NONVIOLENT MEANS. IN FACT, NONVIOLENT MEANS FOR CONFLICT RESOLUTION IS THE CIVILIZED WAY OF DEALING WITH CONFLICT, RATHER THAN THE USE OF FORCE. LET THOSE COMPANIES THAT SPECIALIZE IN SALE OF GUNS, SWITCH TO NONVIOLENT MEANS OF CONFLICT RESOLUTION. IT IS WAY PAST THE TIME FOR US AS CIVILIZED HUMANS TO SOLVE OUR DIFFERENCES BY DECIDING WHO IS STRONGER. RATHER THAN

PUBLIC SUBMISSION

As of: 7/14/18 11:51 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-9lpw Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0828

Public comment 692. Individual. Dianna Holland. 7-7-18

Submitter Information

Name: Dianna Holland

General Comment

CHILDREN ARE DYING, PLEASE STOP THE MADNESS!

PUBLIC SUBMISSION

As of: 7/14/18 11:50 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-9fj2 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0827

Public comment 693. Individual. Mark Diekmann. 7-7-18

Submitter Information

Name: Mark Diekmann

Address:

329 Adams Street
Hoboken, NJ, 07030

Email: markdiek@aol.com

Phone: 201-795-2738

General Comment

I vehemently oppose this rule change. I do not want my government to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The current system of regulation is working effectively and should not be altered. Thank you.

PUBLIC SUBMISSION

As of: 7/14/18 11:49 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-4iz5 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0826

Public comment 694. Individual. Judith Kincaid. 7-7-18

Submitter Information

Name: Judith Kincaid

Address:

1408 Alabama Avenue
Durham, NC, 27705

General Comment

This proposed rule would make our nation and our citizens traveling abroad less safe. We need to put national security above gun manufacturer profits.

PUBLIC SUBMISSION

As of: 7/14/18 11:48 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9450-9m43
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0825

Public comment 695. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Stop the opening of new floodgates for gun sales!

PUBLIC SUBMISSION

As of: 7/14/18 11:46 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9450-eutp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0824

Public comment 696. Individual. Dorothy Hatch. 7-7-18

Submitter Information

Name: Dorothy Hatch

General Comment

I oppose shifting responsibility for gun sales to foreign countries from the Department of State to the Department of Commerce.

PUBLIC SUBMISSION

As of: 7/14/18 11:45 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-9iup Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0823

Public comment 697. Individual. Steve Jones. 7-7-18

Submitter Information

Name: Steve Jones

Address:

1224 W. Cross Street, #1
Baltimore, 21230

General Comment

We have too many guns in this country, and access to them is just too easy. The United States is the only country that has a problem of rampant and all-too-regular gun violence. This has to stop.

PUBLIC SUBMISSION

As of: 7/14/18 11:43 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-yyh2 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0822

Public comment 698. Individual. Mark Miser. 7-7-18

Submitter Information

Name: Mark Miser

General Comment

I think this is a dangerous and very unwise action and I am very much opposed to it!

PUBLIC SUBMISSION

As of: 7/14/18 11:42 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-9yqa Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0821

Public comment 699. Individual. Rosemary Luquire. 7-7-18

Submitter Information

Name: Rosemary Luquire

General Comment

I oppose this action.

PUBLIC SUBMISSION

As of: 7/14/18 10:01 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-kne6 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0820

Public comment 700. Individual. Margie Zamora. 7-7-18

Submitter Information

Name: Margie Zamora

General Comment

Public safety demands that the government monitor and control all firearms sales. The US has the highest firearms crime rate the world. Less control will only lead to more gun violence, as the statistics demonstrate.

PUBLIC SUBMISSION

As of: 7/14/18 9:59 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-6sjt Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0819

Public comment 701. Individual. Andy Winger. 7-7-18

Submitter Information

Name: Andy Winger

General Comment

The price is too high ... in lives destroyed. The arms industry relies on our government to pass legislation that helps them and hurts the rest of us. Modern governments should have the people's best interests in mind. That's what our founding father's risked their lives for.

PUBLIC SUBMISSION

As of: 7/14/18 9:56 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9450-b650 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0818

Public comment 702. Individual. Karen Anonymous. 7-7-18

Submitter Information

Name: Karen Anonymous

General Comment

A major issue with guns is prevalent in todays America due to the complete and total laxity of gun weaponry control. Weaponry available to the military should not now and should have never been made available to the general public or to public servants such as police officers. Mass killing of United States citizens is not only out of control but is due to gun control laxity. We need more gun control, not less.

PUBLIC SUBMISSION

As of: 7/14/18 9:54 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9451-go2x Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0817

Public comment 703. Individual. James Richardson. 7-7-18

Submitter Information

Name: James Richardson

General Comment

I disagree with the President. Firearms, guns and munitions need strict controls.

PUBLIC SUBMISSION

As of: 7/14/18 9:53 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9451-91i0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0816

Public comment 704. Individual. Judith Reed. 7-7-18

Submitter Information

Name: Judith Reed

General Comment

I strongly oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. Regulation of firearms export should be kept with the State Department, as it involves issues far beyond, and far more important nationally, than simple commercial transaction.

PUBLIC SUBMISSION

As of: 7/14/18 9:52 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9451-xcsl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0815

Public comment 705. Individual. Elliot Safdie. 7-7-18

Submitter Information

Name: Elliot Safdie

General Comment

We need background checks for all. It is insane to have someone on the no fly watch list able to go out and buy guns legally. Stop the gun show loopholes as well.

PUBLIC SUBMISSION

As of: 7/14/18 9:50 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9451-cqos
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0814

Public comment 706. Individual. Joe Pfister. 7-7-18

Submitter Information

Name: Joe Pfister

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Transferring the handling of export licenses of semiautomatic assault weapons and other powerful firearms would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/14/18 9:49 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9451-t3gh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0813

Public comment 707. Individual. Darrell House. 7-7-18

Submitter Information

Name: Darrell House

Address:

Wilkinson, IN, 461860387

Email: redwood9@hush.com

Phone: 7657856666

General Comment

Assault weapons have no place in society only the military should have assault weapons !

PUBLIC SUBMISSION

As of: 7/14/18 9:48 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9451-6pos
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0812

Public comment 708. Individual. Margaret Baum. 7-7-18

Submitter Information

Name: Margaret Baum

Address:

249 sunset drive
Wilmette, IL, 60091

General Comment

I strongly oppose this ruling to change control of gun sales to the Commerce Department which would reduce export controls. Guns are weapons and their control belongs under ITAR. Making the world an even more dangerous place in the name of corporate profits is irresponsible governance.

PUBLIC SUBMISSION

As of: 7/14/18 9:44 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9453-61y0 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0811

Public comment 709. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Dont change the rule. Lets not arm the world.

PUBLIC SUBMISSION

As of: 7/14/18 9:42 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9453-ec32
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0810

Public comment 710. Individual. Joan Kranz. 7-7-18

Submitter Information

Name: Joan Kranz

Address:

516 Pepper Ridge Road
stamford, CT, 06905

Email: Joaniefkwow@gmail.com

Phone: 203-329-1118

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. stateDepartment to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 9:41 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9453-qtmx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0809

Public comment 711. Individual. Teresa Rex. 7-7-18

Submitter Information

Name: Teresa Rex

General Comment

The only thing the NRA cares about is money. That is itI oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/14/18 9:40 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9453-bvfp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0808

Public comment 712. Individual. Lisa Stone. 7-7-18

Submitter Information

Name: Lisa Stone

Address:

8902 Birdwood Ct

Apt 404

Houston, TX, 77096

Email: lestone@aya.yale.edu

Phone: 7134988844

General Comment

I join all those Americans who ask you to reject this proposed rule.

This proposal would make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations.

There are many problems with this proposal, including it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PLEASE REJECT THIS PROPOSAL!

PUBLIC SUBMISSION

As of: 7/14/18 9:39 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9453-bdyu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0807

Public comment 713. Individual. Gavi Stevens. 7-7-18

Submitter Information

Name: Gavi Stevens

General Comment

Allowing the Commerce Department to control the sales of assault weapons and weapons in general to overseas customers is a recipe for disaster. They are not setup for the proper vetting of those customers to insure that they are not acting as middlemen for terrorists or other subversive entities that will use them against our troops or our allies or, even worse, civilian populations. That scenario is so likely as to be a virtual certainty, That puts the United States in the position of supporting international terrorism just like those hated Islam states we love to bash.

PUBLIC SUBMISSION

As of: 7/14/18 9:37 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9453-axm4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0806

Public comment 714. Individual. Vivien Smith. 7-7-18

Submitter Information

Name: Vivien Smith

General Comment

I strongly oppose switching the regulation of gun sales from the US State Department to the US Commerce Department. Such a move would clearly come back to bite us.

PUBLIC SUBMISSION

As of: 7/14/18 9:36 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9453-dooa Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0805

Public comment 715. Individual. Landra White. 7-7-18

Submitter Information

Name: Landra White

General Comment

Changing the control of exported weapons to the department of commerce will decrease the safety of civilians all over the globe. Already the import of drugs is paid for by the export of weapons, leading to the violence in Mexico and Central America, and contributing to the number of recent refugees seeking asylum!

PUBLIC SUBMISSION

As of: 7/14/18 9:35 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9453-dakn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0804

Public comment 716. Individual. Jon Hammari. 7-7-18

Submitter Information

Name: Jon Hammari

General Comment

Only cowards resort to guns.

PUBLIC SUBMISSION

As of: 7/14/18 9:33 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9454-tjev Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0803

Public comment 717. Individual. Margaret Ayres. 7-7-18

Submitter Information

Name: Margaret Ayres

General Comment

The Commerce Department does not have the resources adequately to enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Firearm exports should continue to be regulated by the State Department. There is a compelling reason they are, and have long been, regulated by State.

PUBLIC SUBMISSION

As of: 7/14/18 9:32 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-6kkq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0802

Public comment 718. Individual. Martin Horwitz. 7-7-18

Submitter Information

Name: Martin Horwitz

Address:

San Francisco, CA, 94122

Email: martin7ahorwitz@yahoo.com

Phone: 4155046994

General Comment

The State Department should retain control of the regulation of firearms.

Firearms are classified as "military" for good reason, they are not "normal" goods.

They are in need of much more regulation, and that regulation should remain with the State Department, not be moved to the Department of Commerce.

PUBLIC SUBMISSION

As of: 7/14/18 9:31 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-ayq9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0801

Public comment 719. Individual. Theodore J. Bomba Jr. 7-7-18

Submitter Information

Name: Theodore J. Bomba, Jr.

Address:

107 Carousel Circle

New Britain, PA, 18901 5026

General Comment

We certainly don't need to support any plans for the worldwide spread of the embarrassing level of carnage that is the result of the availability of weapons of war to virtually anyone who has the money to buy them in the United States. The American obsession with the Second Amendment is the result of the Republican's use of it as a ploy to get votes and to drive a wedge between their base and those who support sensible controls on who can purchase weapons and on the kinds of weapons that should be available for sale to the average person. It is also a cover for the weapons industry to reap huge profits from the sale of products whose only purpose is to cause the death of fellow humans while using the Constitution as a distraction.

A careful reading of the Second Amendment proves that it was never intended to allow for unrestricted access to any type of weapons that might become available. It has been deliberately misconstrued to suit the purpose of the Republican Party and for use as a marketing tool with which the weapons manufacturers could increase sales and reap huge profits. The weapons industry no longer depends only on sales to the military and on wars to generate profits. One needs only to look at the correlation between increased weapons sales and the mere mention of any kind of gun control legislation to observe this mis-use of the Second Amendment. America quite simply shouldn't be responsible for the increased loss of lives on a worldwide level just to satisfy the greed of those who would profit from unrestricted weapons sales. This nation already has enough blood on its hands, blood that was needlessly shed as a result of profit generating schemes like this. It is time to stop inflicting our brand of 'capitalism' on the people of this planet; we have become the problem.

PUBLIC SUBMISSION

As of: 7/14/18 9:29 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-rd69
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0800

Public comment 720. Individual. Elizabeth Barrett. 7-7-18

Submitter Information

Name: Elizabeth Barrett

General Comment

The last thing we need to do is to help raise money for more gun sales. The gun industry is a negative force in our country, all for the sake of their bottom line. Too bad.

PUBLIC SUBMISSION

As of: 7/14/18 9:28 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9454-vjp7 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0799

Public comment 721. Individual. Jim Hemmingsen. 7-7-18

Submitter Information

Name: Jim Hemmingsen

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The safety of our nation is best served with U.S. State Department governing the firearms export regulations.

sincerely, Jim Hemmingsen

PUBLIC SUBMISSION

As of: 7/14/18 9:27 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-t8nu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0798

Public comment 722. Individual. John Black. 7-7-18

Submitter Information

Name: John Black

General Comment

I am a parent, educator, retiree and my wife and I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, DC, and several large retail chains also prohibit retail sale of semi-automatic assault rifles.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. Senators have explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. Taxpayers will absorb the cost of reviewing applications and processing licenses.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule reduces controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.

Thank you

PUBLIC SUBMISSION

As of: 7/14/18 9:26 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9454-10cf Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0797

Public comment 723. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

SANE GUN REFORM NOW. THIS IS UNACCEPTABLE

PUBLIC SUBMISSION

As of: 7/14/18 9:25 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-7u3z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0796

Public comment 724. Individual. Rosanne Fortner. 7-7-18

Submitter Information

Name: Rosanne Fortner

Address:

113 Paula Circle

Oak Island, NC, 28465

Email: fortner.2@att.net

General Comment

Firearms of all kinds need more control, not less. Echoing Gary Patton, "the change in regulations controlling the distribution of firearms overseas is a transparent and cynical effort to boost gun sales during a down market. Making a profit based on the spilling of blood of others is truly immoral and despicable."

PUBLIC SUBMISSION

As of: 7/14/18 9:24 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-vym3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0795

Public comment 725. Individual. David Johnson. 7-7-187

Submitter Information

Name: David Johnson

General Comment

I respectfully request that this proposed rule change be defeated. Among the reasons are that it

- 1.Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2.Eliminates Congressional oversight for important gun export deals.
- 3.Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- 4.Removes statutory license requirements for brokers, increasing risk of trafficking.
- 5.Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 6.Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- 7.The Commerce Department does not have the resources to enforce export controls, even now.
- 8.Reduces transparency and reporting on gun exports.
- 9.Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Points 1 and 9 above are especially compelling. We definitely should not export our gun violence problems to the rest of the world.

PUBLIC SUBMISSION

As of: 7/14/18 9:23 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-g5v1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0794

Public comment 726. Individual. Miriam Hemphill. 7-7-18

Submitter Information

Name: Miriam Hemphill

Address:

6724 Nw 34th Drive

Gainesville, FL,

Email: mimi hemp@bellsouth.net

Phone: (352) 374-9692

General Comment

This is a bad idea because the U.S. State Department needs to be able to keep track of weapons being exported with the amount of ammunition and things like bump stocks so they do not come back to harm Americans in the future in the U.S. and abroad. This is another sign that this administration only cares about corporations and not the well being of Americans.

"It is putting the fox in charge of the hen house!"

PUBLIC SUBMISSION

As of: 7/14/18 9:21 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9454-2apx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0793

Public comment 727. Individual. Cat Ransom. 7-7-18

Submitter Information

Name: Cat Ransom

Address:

876 Tigres

Cottonwood, AZ, 86326

Email: c_ransom@hotmail.com

Phone: 9286495555

Fax: N/A

General Comment

Weapons are for defense or offense. Making them simply another item of trade denies their deadly potential. If we sell automatic and semiautomatic weapons to the world, those weapons will be used to kill Americans. Let's not arm our enemies.

PUBLIC SUBMISSION

As of: 7/14/18 9:20 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-fe9h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0792

Public comment 728. Individual. Michelle Graves. 7-7-18

Submitter Information

Name: michelle graves

General Comment

you all are not caring about who gets hurt or killed from these assholes that get a hold of any kind of firearms. there needs to be a big limitation on who and get guns and ammo. there's way 2 many people that abuse and use their hatred over others and they get what ever they want and that's unacceptable. the only people I really think that needs any kind of guns is our armed forces and police depts. that's all, but I know there's a lot of people that go out hunting animals for food. there needs to b a lot of limitations on getting things besides just a background checks like a polygraph test to ask questions of why they want a gun in the 1st place. if theres anything that comes back on background check they get nothing. if the polygraph test comes back that something isn't right then nothing, etc. they should have 2 pass a lot of things before they get anything at all.

PUBLIC SUBMISSION

As of: 7/14/18 9:19 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9454-qsle Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0791

Public comment 729. Individual. Mary Winterhalter. 7-7-18

Submitter Information

Name: Mary Winterhalter

General Comment

I am writing to ask that you not approve the rule change that would switch the regulation of gun exports from the State Department to the Commerce Department. In this era of global tension and terrorism, it makes no sense to increase opportunities for other countries to have access to the weapons that could be used to terrorize people around the world.

Thank you for your consideration.

PUBLIC SUBMISSION

As of: 7/14/18 9:18 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-7aje
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0790

Public comment 730. Individual. John Holland. 7-7-18

Submitter Information

Name: John Holland

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You are weaponizing the world for no good reason other than to make a few gun manufacturers richer, these weapons will come back to murder many citizens of this country and others.

PUBLIC SUBMISSION

As of: 7/14/18 9:17 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9454-jkk6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0789

Public comment 731. Individual. Nora Roman. 7-7-18

Submitter Information

Name: Nora Roman

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Selling arms so that governments around the world can kill their people and each other is just not good business, it's evil and disgusting and anything that puts a limit on it is good....highly unlikely that the commerce department, who's only business is profit will care at all....

Down with this evil military industrial prison complex you call your government.

PUBLIC SUBMISSION

As of: 7/14/18 9:15 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9455-dgxd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0788

Public comment 732. Individual. Pamela Lively. 7-7-18

Submitter Information

Name: Pamela Lively

Address:

Monument, CO, 80132

Email: pamelaklively@comcast.net

General Comment

Who in their right mind would agree to sell weapons & spread violence that could target innocent people & Americans? This is one of the craziest schemes to come out of this Administration, & it should never be considered, but since it is, let's just say no to the spread of violence & start working on spreading peace & fundamental liberties.

PUBLIC SUBMISSION

As of: 7/14/18 9:14 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9455-iywo
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0787

Public comment 733. Individual. Harold Johnsen. 7-7-18

Submitter Information

Name: Harold Johnsen

General Comment

The NRA and gun manufacturers want guns EVERYWHERE, and not just here in the United States, but around the world. The NRA scumbags are pushing hard for a rule change that would move the handling of export licenses of semi-automatic ASSAULT weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This CORRUPT transfer of authority WILL open new floodgates for arms sales internationally, with serious NEGATIVE and DANGEROUS implications for our national security.

I vehemently OPPOSE this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Especially at a time when there are TRAITORS in the White House!

PUBLIC SUBMISSION

As of: 7/14/18 9:12 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9455-z7q6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0786

Public comment 734. Individual. Robert Beggs. 7-7-18

Submitter Information

Name: Robert Beggs

Address:

75 N Portage Path Apt 405

Akron, OH, 44303-2532

Email: beggsrobertd@gmail.com

Phone: 3307865716

General Comment

Whether we can successfully repel rebels armed with these weapons is not the only issue. We need to consider what they do to areas where the weapons are sold. Numerous countries have been devastated by the abundance of weapons that inevitably fall into the wrong hands. And both here and in Europe, countries that have remained stable are overwhelmed by refugees understandably fleeing the violence. There is also the factor that when people around the world learn that the weapons that caused all this misery were U.S. made, they understandably hate us.

PUBLIC SUBMISSION

As of: 7/14/18 9:10 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9455-ggwf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0785

Public comment 735. Individual. Michael Tharrett. 7-7-18

Submitter Information

Name: Michael Tharrett

General Comment

I oppose the move of ITAR from DOS to DOC. We cannot control the use of these guns by our own homegrown terrorists, especially the ones used by our military or designed for them like the AR-15. We need to get our house in order. Contrary to what the President thinks, the United States does not need to be like Russia. This appeases his gun lobby & benefits Mr. Trump politically, but that is just a small fraction of the population & it has no consequential benefits for this country. Those arms could be a detriment in another country if sold to the wrong hands. Mr. Trump wouldn't have to come up with schemes like this if he actually understood International Trade & didn't alienate our closest allies, like Canada who we had a trade deficit with before another one of his bright ideas. These arms won't make up for millions of dollars. I'm praying that someone in this government has control in this case, uses common sense & acts responsibly.

PUBLIC SUBMISSION

As of: 7/14/18 9:09 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9455-5h5k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0784

Public comment 736. Individual. Anonymous Nesheim. 7-7-18

Submitter Information

Name: Anonymous Nesheim

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a terrible idea that will effect, not only the USA, but the entire world NEGATIVELY!

PUBLIC SUBMISSION

As of: 7/14/18 9:07 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9456-ymsi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0783

Public comment 737. Individual. Ray Boling. 7-7-18

Submitter Information

Name: Ray Boling

General Comment

As a former member of the NC Medical Examiners Office, I firmly oppose any change of ammunitions and gun sales from the State Department to the Commerce Department. I believe in restricting gun sales to make the world a safer place for our children.

PUBLIC SUBMISSION

As of: 7/14/18 9:06 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9456-ydsw Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0782

Public comment 738. Individual. James Blair. 7-7-18

Submitter Information

Name: James Blair

General Comment

NRA should be NWA. W as in weapon.

PUBLIC SUBMISSION

As of: 7/14/18 9:04 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9456-os6l Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0781

Public comment 739. Individual. Shannon Anonymous. 7-7-18

Submitter Information

Name: Shannon Anonymous

General Comment

Do not change responsibility for regulating sales of non-military weapons and ammunition to foreign actors from State Dept to Commerce Dept. This will not even save money in the short term based on information provided despite claiming so. Let the State Dept do their job of ensuring weapons are not sold to the wrong people.

PUBLIC SUBMISSION

As of: 7/14/18 9:03 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9456-bw4o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0780

Public comment 740. Individual. Debra Elieson. 7-7-18

Submitter Information

Name: Debra Elieson

General Comment

I am opposed to moving government oversight on international gun sales and licensing to the Commerce department. National security as overseen by the State department is the appropriate place to safeguard and value the public's interest over the lobbying efforts of the gun industry.. It would be a massive error and a dereliction of duty to shift the government's interest from national security to the promotion of gun sales abroad.

PUBLIC SUBMISSION

As of: 7/14/18 9:01 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9456-a5ji Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0779

Public comment 741. Individual. Barb Travis. 7-7-18

Submitter Information

Name: Barb Travis

Address:

Ewa Beach, HI, 96706

Email: barbaratravis@hawaiiantel.net

Phone: 8086854460

General Comment

I am against this transfer of control of military weapons from the State Department to the Commerce Department. This will result in the US arming the rest of the world including terrorists.

PUBLIC SUBMISSION

As of: 7/14/18 9:00 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9456-lc3f Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0778

Public comment 742. Individual. Frances Goff. 7-7-18

Submitter Information

Name: Frances Goff

General Comment

The thing NOT to do when the opportunistic bullies threaten Americans is to arm ourselves with weapons we neither understand nor have skills to use. Guns should be regulated as tightly as are automobiles: Registration, passing written and applied skills testing for licensure, prosecution of "vehicular homicide" . . . What do you do when the Mens Rea is a vacant mind?

PUBLIC SUBMISSION

As of: 7/14/18 8:58 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9456-ej79 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0777

Public comment 743. Individual. Joe Veltri. 7-7-18

Submitter Information

Name: Joe Veltri

General Comment

This does nothing to control gun violence. Are you awake?

PUBLIC SUBMISSION

As of: 7/14/18 8:57 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9456-w69d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0776

Public comment 744. Individual. Ann Dorsey. 7-7-18

Submitter Information

Name: Ann Dorsey

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The regulation of firearms needs to be strengthened not weakened and adequate funding for this important purpose be ensured.

PUBLIC SUBMISSION

As of: 7/14/18 8:55 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9456-y8ut
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0775

Public comment 745. Individual. Denis Gould. 7-7-18

Submitter Information

Name: Denis Gould

Address:

1626 Kinder Lane

Dandridge, TN, 37725

Email: dgould4212866@yahoo.com

Phone: 5183214150

General Comment

I want the most secure control of firearms possible to protect our country. Why the proposed change?

PUBLIC SUBMISSION

As of: 7/14/18 8:54 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9456-dn9a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0774

Public comment 746. Individual. Shira Tarantino. 7-7-18

Submitter Information

Name: Shira Tarantino

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms export activities should remain with the State Department due to its nature of dangerous weaponry. The Commerce Department has no business regulating firearms activities. Thank you.

PUBLIC SUBMISSION

As of: 7/14/18 8:52 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9456-nnbz Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0773

Public comment 747. Individual. Concerned Citizen. 7-7-18

Submitter Information

Name: Concerned Citizen

General Comment

We are witnessing more and more dangerous and unnecessary use of firearms by irresponsible persons. This must be stopped now. Fire arms in the hands of irresponsible individuals is and must be regulated and stopped now. Too many innocent individuals are being shot and killed. Please take action IMMEDIATELY. Thank you.

PUBLIC SUBMISSION

As of: 7/14/18 8:43 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9456-b0pu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0772

Public comment 748. Individual. Terry Barth. 7-7-18

Submitter Information

Name: terry barth

General Comment

Gun Reform is needed!

PUBLIC SUBMISSION

As of: 7/14/18 8:38 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9457-1idn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0771

Public comment 749. Individual. Terry Barth. 7-7-18

Submitter Information

Name: terry barth

General Comment

I am opposed to the change proposed that would have our Commerce Dept. regulate firearms rather than our State Dept. The NRA is interested in having as many guns as possible in as many hands as possible - they are not concerned with the safety of the general public!

PUBLIC SUBMISSION

As of: 7/14/18 8:36 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9457-qted Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0770

Public comment 750. Individual. Michael Price. 7-7-18

Submitter Information

Name: Michael Price

General Comment

We need more, not less, regulation of assault weapons and ammunition capable of harming large numbers of our fellow citizens. Recent experience has shown this all too often.

PUBLIC SUBMISSION

As of: 7/14/18 8:35 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9457-jdbd Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0769

Public comment 751. Individual. Natasha Retz. 7-7-18

Submitter Information

Name: Natasha Retz

Address:

7739 Overland Trl
Delaware, 43015-8199

Email: Grbnik@aol.com

Phone: 515-274-9757

General Comment

Tighten gun control laws. Very limited studies, due to the ban on studying gun laws and gun usage, shows that looser gun laws correlate to more gun violence.

PUBLIC SUBMISSION

As of: 7/14/18 8:34 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9457-g4qu Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0768

Public comment 752. Individual. Fr. Jim Hoffman. 7-7-18

Submitter Information

Name: Fr. Jim Hoffman

Address:

110 w. madison st.

Chicago, IL, 60602

Email: frjimhoff404@gmail.com

Phone: 3123725111

General Comment

I WONDER WHERE THE THE RIGHT TO KILL COMES FROM.

PUBLIC SUBMISSION

As of: 7/14/18 8:33 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9457-kkre
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0767

Public comment 753. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am against this rule change that would put control of firearms and related content export into the jurisdiction of the

US Commerce Department from the US State Department.

This is a foolhardy decision that would endanger our national and international security because it could be used by potential terrorists as well as organized crime against the USA and our allies, which could lead to a more fractured and strained global relations situation than what we have now (thanks to Trump and his ill informed decisions).

PUBLIC SUBMISSION

As of: 7/14/18 8:31 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9457-xvgc Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0766

Public comment 754. Individual. Carolyn Cooper. 7-7-18

Submitter Information

Name: Carolyn Cooper

Address:

7175 Uber Street
Philadelphia, PA, 19138

Email: Cooperlasalle@aol.com

Phone: 215-224-2535

General Comment

Why do we focus on one incident at a time? What about all of the gang incidents where illegal gun purchases were made using gun shows, online sales and a lack of background checks. People are dying everyday because of this lack of concern and inaction.

PUBLIC SUBMISSION

As of: 7/14/18 8:30 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9457-2s2a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0765

Public comment 755. Individual. Jeanine Malec. 7-7-18

Submitter Information

Name: Jeanine Malec

General Comment

Weakening gun control measures by ANY MEASURE at this point in time is absolute insanity. The US is the ONLY nation in the world that has regular mass shootings, this has got to stop now. How do gun rights measure up to the freedom to live, to survive, in peace??? We need more and thoughtful gun control measures, immediately! It's an infringement on MY rights as a patent and a human being to loosen gun tegs. Get it together, people!!

PUBLIC SUBMISSION

As of: 7/14/18 8:29 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9457-td0v
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0764

Public comment 756. Individual. David J. Lafond. 7-8-18

Submitter Information

Name: david j. lafond

Address:

70 Brown Avenue
Holyoke, MA, 01040

Email: djlafond@verizon.net

Phone: 4135341736

General Comment

The proposed change allowing the Department of Commerce to oversee gun exports instead of the State Department is unnecessary & unacceptable. One of the primary missions of the Commerce Department is to promote US-made goods abroad without respect to other policy considerations such as security & public safety. The State Department (at least when it was staffed & had a sane person at the top) is much better suited to making the qualitative decisions required when considering the export of guns & munitions. The most important issue is NOT accommodating & supporting the export of gun & munitions manufacturers' products, rather it is proper review of whether the export of these goods is sensible & supportive of our national security & the public safety. In most cases i would argue it is not in our national interest to accommodate & encourage the export of guns & munitions whether for consumer sales or to foreign governments. It's just not the right thing to do.

Please reject this proposed rule change & help to maintain a sane & thorough review by the State Department of ALL the relevant issues when gun and/or munitions exports are proposed.

Thank you for your consideration.

PUBLIC SUBMISSION

As of: 7/14/18 8:28 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9457-syno Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0763

Public comment 757. Individual. Robert Craig. 7-7-18

Submitter Information

Name: Robert Craig

Address:

550 Beacon Drive
Lake Barrington, IL,

Email: arsisil@gmail.com

General Comment

This is the most heavily armed country. Stop expanding gun sales.

PUBLIC SUBMISSION

As of: 7/14/18 8:26 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9458-5p42
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0762

Public comment 758. Individual. Suzanne Ghais. 7-7-18

Submitter Information

Name: Suzanne Ghais

Address:

12934 W. 81st Ave

Arvada, 80005

Email: sghais13@yahoo.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I am concerned about facilitating the export of small arms by putting regulation in the hands of an agency whose job is to promote US products.

PUBLIC SUBMISSION

As of: 7/14/18 8:25 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9458-dfdr Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0761

Public comment 759. Individual. Lisa Hammermeister. 7-7-18

Submitter Information

Name: Lisa Hammermeister

Address:

16456 Shamhart Drive

Granada Hills, 91344

Email: necrohead56@gmail.com

Phone: 8183662703

General Comment

This country is gun crazy. We need control over policies that advocate guns.

PUBLIC SUBMISSION

As of: 7/14/18 8:23 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9458-6w3k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0760

Public comment 760. Individual. Scott Zorc. 7-7-18

Submitter Information

Name: Scott Zorc

General Comment

I oppose the transfer of firearm export authority from the State Dept. to the Commerce Dept. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/14/18 8:22 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9458-zty7 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0759

Public comment 761. Individual. Steven Posner. 7-7-18

Submitter Information

Name: Steven Posner

General Comment

The problem with indiscriminately arming nations is like the weather: If you like a current regime, wait a decade or two and it will change--often to one opposed to the United States. Accordingly, the decision whether to arm a regime is better assessed by the State Department than the Commerce Department, whose emphasis is promoting trade. The proposed rule is short-sighted and should be rejected.

PUBLIC SUBMISSION

As of: 7/14/18 8:17 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9458-2q0l
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0758

Public comment 762. Individual. Gretchen Crook. 7-7-18

Submitter Information

Name: Gretchen Crook

General Comment

Against this proposed change.

Treats semi-automatic assault rifles as non-military

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: 7/14/18 8:14 AM Received: July 07, 2018 Status: Posted Posted: July 14, 2018 Tracking No. 1k2-9459-vd6z Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0756

Public comment 764. Individual. Herman S. Simms Jr. 7-7-18

Submitter Information

Name: Herman S. Simms, Jr.

Address:

6591 Firwood St.

PO Box 2366, 60 E. Milwaukee, Detroit, MI 48202

Detroit, MI, 48210-1304

Email: hsimms49@live.com

Phone: 3136941431

Fax: 48210-1304

General Comment

"Everybody"s got a pistol. everybody's got a .45". -- Gil Scott Heron.

PUBLIC SUBMISSION

As of: 7/14/18 8:13 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9459-me7c
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0755

Public comment 765. Individual. Barb Crumpacker. 7-7-18

Submitter Information

Name: Barb Crumpacker

Address:

1015 East Lakeside Avenue
Coeur d'Alene, 83814

Email: crummy1810@frontier.com

Phone: 2086663466

Fax: 83814

General Comment

I can't believe any caring individual would want MORE guns on the streets! The question should be how do we get fewer guns. Countries that don't allow rampant purchase & use of guns, don't have the epidemic of school/workplace/mall shootings that the US does. Wake up! Guns are a privilege, not a right & come with responsibilities, which a great many folks don't realize.

PUBLIC SUBMISSION

As of: 7/14/18 8:11 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9459-d5t7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0754

Public comment 766. Individual. Brett Robert. 7-7-18

Submitter Information

Name: Brett Robert

General Comment

It appears that much of the energy behind the so-called 2nd amendment movement that works against any and all forms of gun control is coming from the gun manufacturing industry itself. The industry is simply trying to create business for itself regardless of what the consequences are. This is downright sociopathic behavior that the rest of us need to stop enabling and accepting now before things get even worse. The wild west did not have the gun violence that we have today! I am a gun owner myself (Remington 870 tactical pump-action shotgun), but I fully support common-sense gun control and I reject the argument that any gun control will lead to the loss of the right to bear arms.

One thing we can do to improve the current situation, or at least make it no worse, is to prevent the sale of powerful guns and gun accessories to other countries. Our gun policies have made a mess of things here, so we should not try to export them to others. We should not be changing the rules to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department, which sounds uncomfortably close to me like switching from looking at guns with the right amount of care and respect to a situation where we will sell anything to the highest bidder regardless of who that bidder may be.

Don't change the rules and open up international gun sales. We are making ourselves enough of an international

bad guy
as it is.

PUBLIC SUBMISSION

As of: 7/14/18 8:09 AM
Received: July 07, 2018
Status: Posted
Posted: July 14, 2018
Tracking No. 1k2-9459-pp84
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0753

Public comment 767. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change that would move the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/18/18 10:45 AM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9459-tedi Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0752

Public comment 768. Individual. Wallace Elton. 7-7-18

Submitter Information

Name: Wallace Elton

General Comment

Please keep the handling of export licenses for semiautomatic and other military-like weapons in the State Department, which is concerned with safeguarding our country and people. I oppose shifting this control to the Commerce Department with tis focus on boosting trade regardless of the danger involved.

PUBLIC SUBMISSION

As of: 7/13/18 10:59 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9459-2js0 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0751

Public comment 769. Individual. Bruce O Brien. 7-7-18

Submitter Information

Name: Bruce O'Brien

General Comment

The oversight of weapons sales, whether national or international, is a an issue of safety. Weapons cannot be separated from the consequences of wounding and killing. That is why these sales are currently handled by the State Dept. To change oversight of weapons sales to the Commerce Department is to cater to the business of those who would profit from these arms sales, regardless of the consequences. I believe Americans seek a higher standard - that of caring about consequences - than a business model of killing and maiming.

PUBLIC SUBMISSION

As of: 7/13/18 10:57 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9459-e3f3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0750

Public comment 770. Individual. Cynthia O'Neill. 7-7-18

Submitter Information

Name: Cynthia O'Neill

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I oppose switching the regulation of firearms exports from the State Department to the Commerce Department because it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Exports such as these belong to the State Department to handle. This is not commerce - this is exploitation by a lobbying organization to spread its influence around the world without regard to public safety. We need to reduce gun violence. Changing this regulation from the U.S. State Department to the U.S. Commerce Department effectively increases gun violence. This MUST NOT HAPPEN.

PUBLIC SUBMISSION

As of: 7/13/18 10:55 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945a-ueq7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0749

Public comment 771. Individual. Barbara Aronowitz. 7-7-18

Submitter Information

Name: Barbara Aronowitz

General Comment

I oppose this rule which switches the departments who control the guns, etc.

PUBLIC SUBMISSION

As of: 7/13/18 10:54 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945a-m2va Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0748

Public comment 772. Individual. Sharon Flournoy. 7-7-18

Submitter Information

Name: Sharon Flournoy

Address:

Austin, TX, 78703

Email: saflournoy@att.net

Phone: 5124723810

General Comment

This seems like a particularly bad idea to me. These firearms are not only for the hunting enthusiast and hobbyist, but are used as weapons of conflict across the world. That would be the purview of the State Department, not the Commerce Dept. I respect the right of American citizens to own guns, but I do not want to provide the gun industry any greater latitude in their lucrative business of selling weapons around the world.

PUBLIC SUBMISSION

As of: 7/13/18 10:52 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945a-gi53
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0747

Public comment 773. Individual. Julie Bernstein. 7-7-18

Submitter Information

Name: Julie Bernstein

General Comment

Dear State and Commerce Departments,

I am deeply concerned by your proposal to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

We should learn from our previous mistakes. Even when we have personally trained groups that we considered allied with our cause in the use of weapons, it has come back to haunt us, whether it was in Afghanistan or Central America. It is in our best interest to reduce the availability of dangerous firearms throughout the world rather than escalate it.

Thank you,

Julie Bernstein

PUBLIC SUBMISSION

As of: 7/13/18 10:50 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945a-zaoa
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0746

Public comment 774. Individual. Lauryn Anonymous. 7-7-18

Submitter Information

Name: Lauryn Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security and safety in other countries, causing more violence, guerrilla and civil wars, and more refugees fleeing to safety at our shores.

PUBLIC SUBMISSION

As of: 7/13/18 10:44 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945a-bxmo Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0745

Public comment 775. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

No more guns!

PUBLIC SUBMISSION

As of: 7/17/18 3:27 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945a-3912
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0744

Public comment 776. Individual. Pam Elders. 7-7-18

Submitter Information

Name: Pam Elders

Address:

P.O. Box 371

P.O. Box 371

Laupahoehoe, HI, 96764

Email: nflick@baymoon.com

Phone: 8083155188

Fax: 96764

General Comment

As a taxpaying, American citizen I am vehemently opposed to this proposed rule change to move the handling of export licenses of semi-automatic assault-type weapons and other powerful firearms from the State Department to the US Commerce Department, Bureau of Industry and Security.

This is foolhardy and clearly not in the interests of national security. Such a move would mean Congress would not be automatically informed of the sale of large caches of firearms to foreign countries. No prudent person would think giving private arms companies the go-ahead to sell dangerous weapons overseas without proper vetting is a good idea. Furthermore, the Bureau of Industry and Security does not have the resources to adequately enforce export controls.

Largely unregulated arms sales could endanger our national interests and security. Lack of oversight would permit arms sales to anyone, including our enemies. Furthermore, why would we want to threaten world stability and undermine our own global diplomacy as well as that of our allies?

I think that trail leads to the National Rifle Association and its lobbyists. This transfer of authority must not be approved; to do so, is to embrace an unethical and inhumane practice which will only smear our international reputation and harm our diplomatic efforts for peace. Please retain administration of export licenses with the State Department. Peace over profits.

PUBLIC SUBMISSION

As of: 7/13/18 10:40 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945b-5zc9 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0743

Public comment 777. Individual. Carol Carpenter. 7-7-18

Submitter Information

Name: Carol Carpenter

General Comment

Please do not change the rules which offer some protection to civilians.

PUBLIC SUBMISSION

As of: 7/13/18 10:39 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945b-2svh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0742

Public comment 778. Individual. M Schwartz. 7-7-18

Submitter Information

Name: M Schwartz

General Comment

This is utterly ridiculous to loosen the minimal controls of firearms and related items during a time when it is so apparent that we need stronger laws against sales of certain firearms and increased background checks.

PUBLIC SUBMISSION

As of: 7/13/18 10:37 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945b-n711 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0741

Public comment 779. Individual. Sybil Schlesinger. 7-7-18

Submitter Information

Name: Sybil Schlesinger

Address:

22 Rockland Street

Natick, MA, 01760

Email: sybil.sch@gmail.com

Phone: 5084048192

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We want the U. S. State Department to be focused on safeguarding our nation, not the Commerce Department, focused on the bottom line for gun manufacturers.

PUBLIC SUBMISSION

As of: 7/13/18 10:35 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945b-mp5c Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0740

Public comment 780. Individual. Nate Hildebrand. 7-7-18

Submitter Information

Name: Nate Hildebrand

General Comment

Guns are not necessary for a comfortable life. They should not be a commodity, they should be likened to a drug that needs to be regulated. People should not be able to kill one another so easily. Especially automatic or semi-automatic style weapons, they are machines of war that should not be available to the public at all, and definitely not sold abroad where they can't be regulated and kept out of terrorist hands.

PUBLIC SUBMISSION

As of: 7/13/18 10:32 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945c-wzn5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0739

Public comment 781. Individual. Susan Richardson. 7-7-18

Submitter Information

Name: Susan Richardson

General Comment

The NRA & gun manufacturers are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). My country does NOT need to be in the business of supplying guns around the world! When we can see the distressing result that gun ownership has had on this country, WHY DO WE WISH THIS RESULT ON THEM? No more guns!!

PUBLIC SUBMISSION

As of: 7/13/18 10:30 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945c-234o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0738

Public comment 782. Individual. D Arcy Goodrich. 7-7-18

Submitter Information

Name: D'Arcy Goodrich

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not approve the proposed change. This change would detract from the protection of our country which should have top priority.

PUBLIC SUBMISSION

As of: 7/13/18 10:28 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945c-tn3m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0737

Public comment 783. Individual. Lee Clapp. 7-7-18

Submitter Information

Name: Lee Clapp

Address:

824 W. Alice Ave.

Kingsville, TX, 78363

Email: leeclapp@yahoo.com

Phone: 361-474-0190

General Comment

I strongly oppose moving oversight of firearm export licensing from the Department of State to the Department of Commerce.

The proposed rule change treats semiautomatic weapons as "non-military," which is absurd. Moreover, the proposed rule

eliminates Congressional oversight of gun export deals, transfers the cost of processing licenses from gun manufacturers to

tax payers, and enables unchecked gun production in the U.S. and exports abroad by removing the block of 3D printing of

firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which

lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. They should be subject to more controls, not fewer.

PUBLIC SUBMISSION

As of: 7/13/18 10:27 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945c-6mm5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0736

Public comment 784. Individual. Meredith Roach. 7-7-18

Submitter Information

Name: Meredith Roach

General Comment

I am writing in response to the proposed policy to make it easier to export U.S. guns and ammunition globally and the move of export licensing from the State Department to the Commerce Department. We do not need to make it easier to export guns. There are enough in the world. The only reason for this proposed changes is to benefit the gun lobby. Here are other reasons why this should not happen:

- It treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- It eliminates Congressional oversight for important gun export deals.
- It transfers the cost of processing licenses from gun manufacturers to taxpayers.
- It removes statutory license requirements for brokers, increasing risk of trafficking.
- It enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- It reduces transparency and reporting on gun exports.
- It transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

All of these reasons make this policy change ridiculous and terrifying. Please please do not allow this policy to go through. We have enough gun violence all over the world. Why create an even easier path to gun violence and human rights violations?

Thank you,
Meredith Roach

PUBLIC SUBMISSION

As of: 7/13/18 10:25 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945c-pmgr Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0735

Public comment 785. Individual. Rachel Usdan. 7-7-18

Submitter Information

Name: Rachel Usdan

General Comment

I OPPOSE the proposal. It would make America LESS SAFE. The proposal weakens controls over semiautomatic assault weapons including AR-15s and AK-47s, 50 caliber sniper rifles, and high-capacity ammunition magazines. It may also deregulate 3D printing of guns and could ultimately weaken controls on firearm imports. The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups. The proposed rules are a priority for the National Rifle Association and the National Shooting Sports Foundation (the official trade association for the firearms industry) who want to open up international markets to compensate for lagging domestic gun sales.

PUBLIC SUBMISSION

As of: 7/13/18 10:21 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945c-lkm1 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0734

Public comment 786. Individual. Mandy Foster. 7-7-18

Submitter Information

Name: Mandy Foster

Address:

318 Bermuda St
New Orleans, 70114

Email: fosterfest@gmail.com

Phone: 5046694357

Fax: 70114

General Comment

Please keep the firearms export licensing function within the State Dept. I am a voter and a mother concerned about the conflict of interest posed in transferring this function to the Commerce Dept.

PUBLIC SUBMISSION

As of: 7/13/18 10:20 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945d-vk23
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0733

Public comment 787. Individual. DeSean Freeman. 7-7-18

Submitter Information

Name: DeSean Freeman

General Comment

In order to accurately and adequately account for the direct correlation between firearms possession and the violence associated with it, 'repeal' the "Dickey Amendment" barring the national Center for Disease Control and Prevention (CDC) from studying firearms violence. Seems simple, does it not?

PUBLIC SUBMISSION

As of: 7/13/18 10:18 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945d-yna0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0732

Public comment 788. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Our Kids Lives Mean More Than Your STUPID BLOODY TOYS

PUBLIC SUBMISSION

As of: 7/13/18 10:16 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945d-s049
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0731

Public comment 789. Individual. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

WE need MORE government control of firearms, not less. This proposal is a blatant attempt to increase weapons sales to set even more of the world on fire.

PUBLIC SUBMISSION

As of: 7/13/18 10:14 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945d-dyur
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0730

Public comment 790. Individual. Julie Buckner. 7-7-18

Submitter Information

Name: Julie Buckner

General Comment

I am writing to voice my strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms more dangerous by transferring controls to an agency that prioritizes business interests over national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also concerning. This rule seems designed to create profits for the U.S. gun industry. The rules description of semiautomatic assault rifles like the AR-15 as civilian products is also concerning. These weapons were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. Please do not go forward with this dangerous policy.

PUBLIC SUBMISSION

As of: 7/13/18 10:12 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945d-oqsu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0729

Public comment 791. Individual. Michi Vojta. 7-7-18

Submitter Information

Name: Michi Vojta

General Comment

We need FEWER guns, and tighter controls over who gets them. there is no need for automatic or semi-automatic rifles to be readily available, or really any need for basically anyone aside from the military to own/have.

Therefore, I OPPOSE this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/13/18 10:11 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945d-cuo0 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0728

Public comment 792. Individual. Heather Davis. 7-7-18

Submitter Information

Name: Heather Davis

Address:

Aloha, OR, 97003-2575

Email: heatherannedavis@hotmail.com

Phone: 5032921926

General Comment

there is not one individual, that is a well trained militia,, therefor guns do warrant control, ban all assault rifles,,

PUBLIC SUBMISSION

As of: 7/13/18 10:09 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945e-i2n5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0727

Public comment 793. Individual. Heather Tausig. 7-7-18

Submitter Information

Name: Heather Tausig

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Not only is this an issue of national security but I believe we have a moral obligation not to export weapons intended to kill other human beings. Our gun record in the United States is abysmal. We have to deal with that here and not export that kind of possibility to other countries ...

PUBLIC SUBMISSION

As of: 7/13/18 10:06 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945e-yusk Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0726

Public comment 794. Individual. Helen Greer. 7-7-18

Submitter Information

Name: Helen Greer

General Comment

Gun deaths are an epidemic in the USA. No other industrialized nation has the same problem. That's because they have common sense gun laws. We need them too.

PUBLIC SUBMISSION

As of: 7/13/18 10:00 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945e-u4xq Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0725

Public comment 795. Anonymous. 7-7-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose the rule change that would shift the handling of firearm exports from the U.S. State Department to the Commerce Department. It is unnecessary and will only serve to help terrorists.

PUBLIC SUBMISSION

As of: 7/13/18 9:57 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945e-dqtk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0724

Public comment 796. Individual. Madhav Vishnubhatta. 7-7-18

Submitter Information

Name: Madhav Vishnubhatta

Address:

2, Fairgate Drive
Stamford, CT, 06902

Fax: 06902

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule would only lead to these firearms that are moved out of the USML list to be sold internationally for profit and thus exporting the problems that USA faces due to widespread gun ownership. Hence please do not proceed on this rule.

PUBLIC SUBMISSION

As of: 7/13/18 9:55 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945e-6hwm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0723

Public comment 797. Individual. Debbie Lyman. 7-7-18

Submitter Information

Name: Debbie Lyman

General Comment

I believe the USML should remain as it is now. The rule change from State to Commerce is dangerous and should not be implemented.

The change would facilitate firearm exports landing in terrorist or criminal organizations and into the hands of repressive regimes. This must be stopped for international safety concerns and not be done by a presidential whim.

PUBLIC SUBMISSION

As of: 7/13/18 9:53 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945e-c3mc
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0722

Public comment 798. Individual. Barbara Flores. 7-7-18

Submitter Information

Name: Barbara Flores

General Comment

Americans make up 4% of the world's population, and we own close to half of the world's civilian guns. We have the NRA to thank for this situation. I do not want them to export their toxic craziness.

PUBLIC SUBMISSION

As of: 7/13/18 9:51 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945f-lqqn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0721

Public comment 799. Individual. Kelly deRosier. 7-7-18

Submitter Information

Name: Kelly deRosier

Address: United States,

General Comment

How many more people need to die before we acknowledge that the sale of guns is out of control. The president is in bed with the NRA. I will not vote for any candidate who takes NRA money. I a man donating to candidates who want sensible gun control, registration, etc.

PUBLIC SUBMISSION

As of: 7/13/18 9:49 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945f-yye7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0720

Public comment 800. Individual. Vicki Brown. 7-7-18

Submitter Information

Name: Vicki Brown

General Comment

Why in the world are you considering this? I vehemently oppose the switch of regulations of firearms from the State Dept. to the Commerce Dept. I can just imagine the cheering of the firearm traffickers, organized crime, terrorists and others if this is done. The world is already a dangerous place. You really don't need to help make it worse. Please put a stop to this insanity just to make some people richer.

PUBLIC SUBMISSION

As of: 7/13/18 9:32 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945f-hskl Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0719

Public comment 801. Individual. Marilyn Duerbeck. 7-7-18

Submitter Information

Name: Marilyn Duerbeck

Address:

1747 e northern ave
Phoenix, AZ, 85020

Email: Mduer71704@aol.com

Phone: 602-371-9150

General Comment

I oppose this rule change. This is not a good idea.

PUBLIC SUBMISSION

As of: 7/13/18 9:30 PM Received: July 07, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945f-pooa Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0718

Public comment 802. Individual. Concerned DC resident and US citizen. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We have seen the terrible impact of the for-profit gun lobby in the US. We cannot expand the tragedies of mass shootings and increased fatal suicides and violent domestic abuse with a firearm to other countries, which is exactly what will happen if firearms, guns, ammunition, and related articles are governed by Commerce rather than State.

Signed,

A concerned DC resident and US citizen

PUBLIC SUBMISSION

As of: 7/13/18 9:27 PM
Received: July 07, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945f-unqs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0717

Public comment 803. Individual. David Grant. 7-8-18

Submitter Information

Name: David Grant

General Comment

Another citizen opposed to moving supervision of firearms/ ammunition regulations from the State Department to the Commerce Department. What are you thinking? Commerce is about selling things, generally to foreign markets. Are we only interested in promoting sales of firearms and ammunition? The State Department has been and obviously continues to be the agency of choice in this matter.

PUBLIC SUBMISSION

As of: 7/13/18 9:26 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945g-t834
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0716

Public comment 804. Individual. Cheryl Dzubak. 7-8-18

Submitter Information

Name: Cheryl Dzubak

General Comment

I am opposed to the Trump administration proposal to make it easier to export U.S. guns and ammunition globally, even though U.S.- exported firearms are already used in many crimes, attacks and human rights violations in many other nations. These are the reasons that I am concerned:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The Trump administration proposal applies to assault weapons and other powerful firearms, moving export licenses from the State Department to the Commerce Department. The U.S. gun lobby has advocated for these policies. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually. The fact that this proposal applies to assault weapons and other powerful firearms typically used in the military is concerning in that terrorist organizations may be able to easily get their hands on these weapons. We do not need to increase the potential use of weapons whether they are here or exported abroad. Thank you for your consideration of this serious matter.

PUBLIC SUBMISSION

As of: 7/13/18 9:24 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945g-xqjs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0715

Public comment 805. Individual. Bertino Marro. 7-8-18

Submitter Information

Name: Bertino Marro

Address:

578 10th St.

Brooklyn, NY, 11215

Email: bertmarro@hotmail.com

General Comment

How about appointing a "literalist" to the Supreme Court? A judge who can tell the difference between the rights of "a well organized militia" from the rights of an ordinary citizen under that beloved second amendment to the Constitution so often (mis)applied by the American gun community?

PUBLIC SUBMISSION

As of: 7/13/18 9:22 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945h-1vyv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0714

Public comment 806. Individual. Eric Stordahl. 7-8-18

Submitter Information

Name: Eric Stordahl

General Comment

I oppose loosening any regulations on firearms. I support making firearm regulation more stringent.

PUBLIC SUBMISSION

As of: 7/13/18 9:20 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945i-xod7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0713

Public comment 807. Texas Gun Sense. Kim LeBlanc. 7-8-18

Submitter Information

Name: Kim LeBlanc

Organization: Texas Gun Sense

General Comment

I oppose the proposed rule change because it will do the following:

- Treat semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminate Congressional oversight for important gun export deals.
- Transfer the cost of processing licenses from gun manufacturers to taxpayers.
- Remove statutory license requirements for brokers, increasing risk of trafficking.
- Reduce or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduce transparency and reporting on gun exports.
- Transfer gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Please oppose the proposed rule change. This matter was brought to my attention by Texas Gun Sense. Our country does not need reckless laws and rule changes such as these that undermine common sense gun safety. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 9:17 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945i-9s26
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0712

Public comment 808. Individual. Kathleen McHendry. 7-8-18

Submitter Information

Name: Kathleen McHendry

General Comment

This is quite possibly the most dangerous idea that will affect all countries safety that I have read about in a while. It would be equivalent to advertising for people to commit more acts of violence because of the ease with which it would become to acquire sophisticated assault weapons. The only entities that benefit from such a reckless change of managing departments are the gun manufacturers. The implications of this are so catastrophic and wide ranging that the anticipated potential should be criminal and therefore halted.

PUBLIC SUBMISSION

As of: 7/13/18 9:15 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945m-ugm3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0711

Public comment 809. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

NO on this proposed rule which will only benefit special interests who are lobbying with money and influence and will not benefit the people and children of this county. Really, Mr. President? Drain the swamp? NO, not with this twisted and immoral "proposal." NO!

PUBLIC SUBMISSION

As of: 7/13/18 9:12 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945m-z3wa Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0710

Public comment 810. Individual. M.A. Whelan M.D. 7-8-18

Submitter Information

Name: M.A. Whelan M.D.

Address:

241 County Highway 28
Cooperstown, 13326-2703

Email: mawhelan@capital.net

Phone: 6075475203

Fax: 13326-2703

General Comment

The Commerce Dept. should not be in control of the sale/export of guns, ammunition, and related articles. This is more important than simply commercial transaction! Indiscriminate dissemination of weapons should not be allowed. Sincerely, M.A. Whelan MD

PUBLIC SUBMISSION

As of: 7/13/18 9:08 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945n-vc3p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0709

Public comment 811. Individual. Emeline Crawford. 7-8-18

Submitter Information

Name: Emeline Crawford

General Comment

I am opposed to giving the Commerce Department the responsibility for international gun sales. This country should not be pushing gun sales internationally.

PUBLIC SUBMISSION

As of: 7/13/18 9:07 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945n-5o0k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0708

Public comment 812. Individual. A. S. 7-8-18

Submitter Information

Name: A. S.

General Comment

Please stop the NRA backed rule and re-consider how your proposed regulations will change the face of safety in our society using the following points:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

I am the mother of 5 children who deserve to be safe and protected. Please stop this!
A.S.

PUBLIC SUBMISSION

As of: 7/13/18 9:05 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945n-scps
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0707

Public comment 813. Individual. James Rice. 7-8-18

Submitter Information

Name: James Rice

General Comment

Hello,

If you're being mugged and you have a gun, would you hand it over to them? President Trump's proposal to lift the current regulations exports seems to be doing the same thing. I believe the the inherently military nature of these firearms means that the sale of them is an issue of national security. I feel very strongly that the gun export laws should stay as they are. Why would we make it easier for potential terrorists or international criminals to obtain lethal weapons?

Thank you for your time.

PUBLIC SUBMISSION

As of: 7/13/18 9:03 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945n-irfu Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0706

Public comment 814. Individual. Adriana Carr. 7-8-18

Submitter Information

Name: Adriana Carr

Address:

2835 New Providence Court
Falls Church, VA, 22042

Email: adriana.carr341@gmail.com

Phone: 7033807154

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Adriana Carr
2835 New Providence Court
Falls Church, VA 22042

PUBLIC SUBMISSION

As of: 7/13/18 9:02 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945n-i7lk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0705

Public comment 815. Individual. Kathleen Brady. 7-8-18

Submitter Information

Name: Kathleen Brady

Address:

5053 Cobblestone Rd

WINSTON SALEM, 27106

Email: kabmhb@gmail.com

Phone: 3369224289

General Comment

I am a tax-paying citizen who is concerned about the consequences of this proposed rule change.

Please consider other alternatives to this proposed rule that would:

1. Eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. Remove licensing requirements for brokers, increasing the risk of trafficking.
3. Remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/13/18 9:00 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945o-zmpz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0704

Public comment 816. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry.

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: 7/13/18 8:58 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945o-uy1w Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0703

Public comment 817. Individual. Harriet Solomon. 7-8-18

Submitter Information

Name: Harriet Solomon

General Comment

The proposed changes in the rule regarding international arms regulations are RECKLESS. Lives around the world will be endangered by international and domestic criminals. It boggles the mind that an American administration can be so blind to the effect of these changes on the freedom of the traveling public to go anywhere without fear of gun violence; on the freedom of Americans to go about their business in their own country; and on the general safety of the world at large.

Please do not change these rules so drastically. They've been in place since 1940; they still work. You are hurting us, your constituents whom you promised and swore and oath to protect against all enemies, foreign and domestic. These rule changes violate that oath on every ground.

PUBLIC SUBMISSION

As of: 7/13/18 8:56 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945o-6ov1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0702

Public comment 818. Individual. Suzanne Napier. 7-8-18

Submitter Information

Name: Suzanne Napier

Address:

603N Tumbleweed

Austin, TX, 78733

Email: snapier603@gmail.com

Phone: 5122632206

General Comment

I oppose this proposed rule for the following reasons, and for my belief that will make our world even for violent. Congress is shirking their responsibility to protect the American people.

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: 7/13/18 8:54 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945o-z325
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0701

Public comment 819. Individual. Kathryn Jones. 7-8-18

Submitter Information

Name: Kathryn Jones

Address:

320 E Waring Ave

State College, PA, 16801

Email: katie.trail@gmail.com

Phone: 8143089392

General Comment

I am against this change, as I find it to be an issue of national security; switching the regulation of firearms exports from the State Department to the Commerce Department is a dangerous proposal.

PUBLIC SUBMISSION

As of: 7/13/18 8:53 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945o-4hhr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0700

Public comment 820. Individual. Carol Ortiz. 7-8-18

Submitter Information

Name: Carol Ortiz

Address:

256 Mesa Vw

Montgomery, TX, 77316

Email: mazola0523@yahoo.com

Phone: 9364431848

General Comment

I strongly oppose this proposal to transfer the oversight of weapons export from the State Dept. to the Commerce Dept. The change is only for the benefit of the gun manufacturers to increase their profits and to weaken law enforcement over firearms trafficking to shady gun dealers. The security of civilian citizens here and abroad would be at increased risk for the following reasons.

The proposed change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: 7/13/18 8:51 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-5t3u
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0699

Public comment 821. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Weapons which will be exported need to be under the purview of the US State Department.

PUBLIC SUBMISSION

As of: 7/13/18 8:49 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-5oyd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0698

Public comment 822. Individual. Lawrence Turk. 7-8-18

Submitter Information

Name: Lawrence Turk, RN

Address:

POB 203

Hendersonville, NC, 28793

Email: butch@wildrockies.org

General Comment

No, dont loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals.

The proposed rule appears to be largely driven by the interests of industry.

The proposed rule does not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. Also, the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Dont eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Dont remove licensing requirements for brokers, increasing the risk of trafficking.

Dont remove the State Departments block on the 3D printing of firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: 7/13/18 8:47 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-pnvv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0697

Public comment 823. Individual. Julie Lang. 7-8-18

Submitter Information

Name: Julie Lang

General Comment

We must do everything we can to limit access to guns in America, especially military assault weapons. This is a ridiculous epidemic, and will be a black scar in American history. Do the right thing and protect our citizens and our students!

PUBLIC SUBMISSION

As of: 7/13/18 8:45 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-86zg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0696

Public comment 824. Individual. George Shafer. 7-8-18

Submitter Information

Name: George Shafer

General Comment

This rule would make it much more dangerous for Americans traveling abroad, especially when Trump has made so many enemies around the world with his bullying.

PUBLIC SUBMISSION

As of: 7/13/18 8:43 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-cbxn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0695

Public comment 825. Individual. Colleen Shearer. 7-8-18

Submitter Information

Name: Colleen Shearer

General Comment

I am against a Trump Administration rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally.

PUBLIC SUBMISSION

As of: 7/13/18 8:41 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-bphw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0694

Public comment 826. Individual. Frances Elsemore. 7-8-18

Submitter Information

Name: frances elsemore

Address:

28 beechstone, apt 2
portsmouth, NH, 03801

Email: f.elsemore@gmail.com

General Comment

In issues relating to weapons, the priority should be safety, not profit.

PUBLIC SUBMISSION

As of: 7/13/18 8:39 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945p-4gl1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0693

Public comment 827. Individual. Denise Bullock. 7-8-18

Submitter Information

Name: Denise Bullock

General Comment

I vehemently opposed moving regulation of firearms export to the U.S. Commerce Department. Firearms are far from ordinary exports. Our responsibility is not to make money but to ensure safety. We do not need to export our appallingly high death rates from firearms.

PUBLIC SUBMISSION

As of: 7/13/18 8:37 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-a11x
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0692

Public comment 828. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

We have to keep these regulations! It helps keep people safe.

PUBLIC SUBMISSION

As of: 7/13/18 8:33 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-uxeq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0691

Public comment 829. Individual. Martin Washburn. 7-8-18

Submitter Information

Name: Martin Washburn

General Comment

Deregulation of weapons sales allows for the sale of weapons to a second buyer. This allows the weapons to be procured by terrorist organizations we are trying to stop. This benefits the military individual complex and the never-ending war but reduces national security.

PUBLIC SUBMISSION

As of: 7/13/18 8:31 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-cdo0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0690

Public comment 830. Individual. Mary Goodkind. 7-8-18

Submitter Information

Name: Mary Goodkind

Address:

23 Ridgefield Pl

Billmore Forest, 28803

Email: mary@lindleyg.com

Phone: 8284247151

General Comment

The Trump administration proposes changes to the agreements affecting the sale of weapons abroad, changes that I believe would make the world a more dangerous place. Please don't value commercial gain as more important than keeping all of us safe.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please do not dismantle important protections that have served us well and that we still need.

PUBLIC SUBMISSION

As of: 7/13/18 8:24 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-f01i
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0689

Public comment 831. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

The proposed rule would loosen regulatory oversight of the export of firearms. Other than increasing the profits of arms manufacturers and distributors, there is no plausible rationale for reducing such oversight. Now more international terrorists, drug traffickers, and other kinds of criminals will have access to weaponry they shouldn't have. This is an ill-considered, dangerous rule, one that should not be implemented.

PUBLIC SUBMISSION

As of: 7/13/18 8:21 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-j5o8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0688

Public comment 832. Individual. Rachel Lee. 7-8-18

Submitter Information

Name: Rachel Lee

Address:

2221 N Cardillo Ave
Palm Springs, 92262

Email: raquel_lee@icloud.com

General Comment

We know that gun violence spreads like a virus, from one person/family to another and across communities and states. Simply being close to a gun increases the chances that you will be harmed, domestic violence, suicide or accidentally. Gun violence is an epidemic in America, spreading like a wildfire in California. Please don't export this violence to other countries which would make gun violence a pandemic, like the deadly flu in 1918. It was not a disease that could be controlled. This violence will circle back through America ten-fold and may revisit it's deadly effect on you or your family.

As a physician, I stabilize patients using the ABCs first, Airway, Breathing, Circulation, the most necessary functions to keep one's body alive. Sometimes that means we don't treat the cause of their emergency first. We stabilize the airway so they can get air in, we ensure they can oxygenate effectively and then we make sure their heart is working and their blood pressure is adequate to perfuse the brain. Once we know those major organs are taken care of, we can begin to search for a cause. First, we have to buy ourselves time to work. We can continue to about the causes of gun violence but first we have to stop the gun deaths and stabilize the situation to give ourselves time to come up with reasonable plans. For now, stop spreading the gun violence by making more guns, transporting more guns and making it easier to get guns, even temporarily. Ideally, if at least temporarily, HALT gun sales. There are more than enough guns on the market for people to sell to each other. Let's discuss this without all the rhetoric, without the NRA. Let's look at the science. Don't spread this epidemic. ABCs, stop the bleeding.

PUBLIC SUBMISSION

As of: 7/13/18 2:43 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-w9do
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0674

Public comment 833. Individual. Karen Puffett. 7-8-18

Submitter Information

Name: Karen Puffett

General Comment

I am very OPPOSED to the proposed regulation to move the firearms exports from the State Department to the Department of Commerce.

The State Departments oversight and regulatory authority is critical to our countrys safety by monitoring weapons domestically and those coming into this country. Since most types of firearms can be used for military and terrorist activities and they should remain under the scrutiny of the Department of State for our protection rather than Department of Commerce for promoting export of our goods with little oversight.

If the regulatory rule is changed, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Additionally, the Commerce Department just does not have the resources to adequately enforce export controls which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The end result is firearms will be exported to anyone with money.

For the safety of the people of our country and the world, PLEASE DO NOT approve this move.

PUBLIC SUBMISSION

As of: 7/13/18 2:41 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945q-zdjk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0671

Public comment 834. Individual. Cheryl Hanks-Hicks. 7-8-18

Submitter Information

Name: Cheryl Hanks-Hicks

Address:

Eugene, OR, u

Email: Cherylhicks@yahoo.com

General Comment

This maybe the worst idea that has come out of this administration. Firearms, guns, weapons, and amunitions, among other related issues have absolutely no place being controlled/ regulated by the Commerce Department! Where else would you put guns, weapons, and amunitions accept under the United States MUNTIONS List, duh? The sale, transfer, and control of these items are definitely a reasonable threat to our security! Please, leave these on the Munitions List, where they most certainly belong!

PUBLIC SUBMISSION

As of: 7/13/18 2:40 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945r-305w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0670

Public comment 835. Individual. Michael Sklar. 7-8-18

Submitter Information

Name: Michael Sklar

Address:

13301 Ludlow Avenue

Huntington Woods, MI, 48070

Email: mssklar62@gmail.com

Phone: 2485421789

Fax: 48070

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It violates the legal strictures governing the United States Munitions List. It exceeds the Administration's authority delegated to it by Congress. It subordinates the national interest to the economic interests of firearms manufacturers by moving administration of these regulations to a Cabinet department whose mission is trade promotion and business sales.

PUBLIC SUBMISSION

As of: 7/13/18 2:38 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945r-52fl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0669

Public comment 836. Individual. K. Worrell. 7-8-18

Submitter Information

Name: K. Worrell

General Comment

There are two major problems with this rule change moving the handling of export licenses of semiautomatic assault and other firearms from the U.S. State Department to the U.S. Commerce Department. First, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. Second, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This rule change would, therefore, make it much easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous groups and organizations to obtain large caches of American guns and ammo with which to commit their horrendous crimes.

This rule change should not take place in the best interests of both American security and moral conscience.

PUBLIC SUBMISSION

As of: 7/13/18 2:36 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945r-p6tk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0668

Public comment 837. Individual. Carole Bassett. 7-8-18

Submitter Information

Name: Carole Bassett

General Comment

I am opposed to the proposed rule: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the US Munitions List. I am concerned about moving the control of firearms, etc. to the Commerce Dept. and I also share the concerns voiced by Amnesty International regarding fears of escalating problems associated with entities responsible for human rights violation. Please keep control of the firearms, guns, etc. list with the State Department.

Carole Bassett, Ph.D.

PUBLIC SUBMISSION

As of: 7/13/18 2:35 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945s-tt4p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0667

Public comment 838. Individual. Rachael Brown. 7-8-18

Submitter Information

Name: Rachael Brown

General Comment

Dear BIS:

I oppose the proposed rule for the following reasons:

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[2] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[3] The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons,

the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.[4] The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in countries that are responsible for most of the increasing and record levels of homicides.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/13/18 2:33 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945s-m719
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0664

Public comment 839. Individual. Jennifer Holt. 7-8-18

Submitter Information

Name: Jennifer Holt

General Comment

Gun Reform and control of access to guns&ammunition must apply to those posing a public safety threat! This is not a Second Amendment nullification rather it is an enforcement of our Founding Fathers Declared Rights of " Life,Liberty and the Pursuit of Happiness ".

PUBLIC SUBMISSION

As of: 7/13/18 2:31 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945s-oy26
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0662

Public comment 840. Individual. Hannah Siegel. 7-8-18

Submitter Information

Name: Hannah Siegel

General Comment

I strongly oppose this proposed rule, as it would make it easier for the US to export lethal weaponry and firearms. Whether intentionally or unintentionally, U.S.-made weapons often fall into the hands of global arms traffickers. Whether in Yemen, Niger, or Mexico, malicious actors such as terrorists, gangs, and cartels use these American products to sow fear and instability. Please, for the betterment of world security and the American reputation, do not allow this proposed rule to go forward.

PUBLIC SUBMISSION

As of: 7/13/18 2:30 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945s-ejxz Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0661

Public comment 841. Individual. Eugene Crook. 7-8-18

Submitter Information

Name: Eugene Crook

General Comment

First, we should not be exporting anything to any country where it is currently against the law to own or possess such an item. This action would undermine that country's right to their own sovereign rule.

Second, we have become the leading nation in the world in gun deaths, and we do not want to export that disease to any other country in the world.

Third, exporting these items will create enemies and the US at this point needs friends, not new enemies.

PUBLIC SUBMISSION

As of: 7/13/18 2:24 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945t-yz07
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0660

Public comment 842. Individual. Virgene Link-New. 7-8-18

Submitter Information

Name: Virgene Link-New

General Comment

To Whom It May Concern:

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We do not need to be making money by supplying arms to the world. We do not want to promote warfare, killing and poaching, which is what guns lead to.

Let's make money by exporting wholesome technology, like green power, or medical equipment. Thank you.

Virgene Link-New

PUBLIC SUBMISSION

As of: 7/13/18 2:21 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945u-5ztj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0657

Public comment 843. Individual. Bobbie Huskey. 7-8-18

Submitter Information

Name: Bobbie Huskey

General Comment

we need common sense gun reform such as background checks, preventing mentally ill and violent domestic partners from purchasing guns, preventing the sales of guns on line.

PUBLIC SUBMISSION

As of: 7/13/18 2:17 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945u-3van
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0652

Public comment 844. Individual. Gerri Horka. 7-8-18

Submitter Information

Name: Gerri Horka

Address:

325 Pepper Avenue
Hillsborough, CA, 94010

General Comment

I am in ABSOLUTE opposition to this proposed change!

PUBLIC SUBMISSION

As of: 7/13/18 2:15 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945u-t3kl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0643

Public comment 845. Individual. B. Roxanne Taylor. 7-8-18

Submitter Information

Name: B. Roxanne Taylor

General Comment

Please block the administration's proposed rule that would loosen exports of firearms which could end up in the hands of criminals & terrorists. These weapons could then be used against US citizens.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/13/18 2:05 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945u-9hsz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0642

Public comment 846. Individual. Hannah Sholder. 7-8-18

Submitter Information

Name: Hannah Sholder

General Comment

I oppose relaxing firearm export rules.

PUBLIC SUBMISSION

As of: 7/18/18 4:48 PM
Received: July 06, 2018
Status: Posted
Posted: July 18, 2018
Tracking No. 1k2-944m-n5w0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1747

Public Comment 847. Individual. Alena Jorgensen. 7-4-18.

Submitter Information

Name: Alena Jorgensen

Address:

Temple City, CA, 917801651

Email: aj.1156@yahoo.com

Phone: 6266148615

General Comment

STOP trying to kill off the surplus population.

PUBLIC SUBMISSION

As of: 7/13/18 1:45 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945v-xlu5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0634

Public comment 848. Individual. Jill Van Vlack. 7-8-18

Submitter Information

Name: Jill Van Vlack

General Comment

Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/13/18 1:38 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945v-jq6h
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0632

Public comment 849. Individual. EM Ryan. 7-8-18

Submitter Information

Name: EM Ryan

General Comment

As a responsible American citizen, I very much oppose any change that would move regulations of firearm or other weapon exports from the U.S. Department of State to the U.S. Department of Commerce. The U.S. has by far the world's highest rate of gunshot death and injury, including suicide, homicide, and accident. The rest of the world doesn't want our violent statistics, our guns, our fear, our pain. The rest of the world certainly doesn't want or need our semiautomatic weapons or firearms that can be converted to semiautomatic weapons. Say no to any such change.

PUBLIC SUBMISSION

As of: 7/13/18 1:36 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945v-bfxw
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0631

Public comment 850. Individual. T Schicker. 7-8-18

Submitter Information

Name: T Schicker

General Comment

I oppose the rule change of export of firearms to the commerce department. I am concerned about the security crisis this could cause as more firearms are sold internationally.

PUBLIC SUBMISSION

As of: 7/13/18 1:34 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945v-jtka Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0630

Public comment 851. Individual. Michael Golen. 7-8-18

Submitter Information

Name: michael golen

General Comment

I am opposed to lessening restrictions on gun purchases.

PUBLIC SUBMISSION

As of: 7/13/18 1:26 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945w-mtyl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0628

Public comment 852. Individual. Melanie Greene. 7-8-18

Submitter Information

Name: Melanie Greene

General Comment

As a gun-owning taxpayer, I am very concerned about this proposed change in policy. I'm especially concerned that this change eliminates Congressional oversight for important gun export deals. It reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and eliminates registration of firearms exporters, a requirement since the 1940s.

The Commerce Department does not have the resources to enforce export controls, even now. It reduces transparency and reporting on gun exports. It transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade. This does not seem to be in humanity's or our country's best interests.

PUBLIC SUBMISSION

As of: 7/13/18 1:24 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945w-rc81
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0627

Public comment 853. Individual. Kathy Bradley. 7-8-18

Submitter Information

Name: Kathy Bradley

General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. International firearms sales must remain classified as "military" and therefore under regulation by the State Department, so that Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, or to countries where there are serious human rights concerns.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This would create an unacceptable proliferation of firearms in the hands of dangerous groups. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Further, the rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Given the issues with gun violence and the trump Administration's attitude against immigration, this rule change would make two extremely bad situations much worse.

PUBLIC SUBMISSION

As of: 7/13/18 1:22 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945w-v2y5 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0626

Public comment 854. Individual. Nina Austin. 7-8-18

Submitter Information

Name: Nina Austin

Address:

62 Seneca East

Hawthorn Woods, IL, 60047

Email: ninaaustin@hotmail.com

General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce

PUBLIC SUBMISSION

As of: 7/13/18 1:20 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945w-kbg7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0625

Public comment 855. Individual. Nancy Borelli. 7-8-18

Submitter Information

Name: Nancy Borelli

Address:

Santa Rosa Va, CA, 93012

Email: nancyborelli@gmail.com

Phone: 8059076523

General Comment

I oppose switching the regulation of the export of firearms from the State Department to the Department of Commerce. This is purely a political move to benefit the gun lobby and gun manufacturers and retailers and poses a huge risk for safety of the people. Do not switch the oversight of the export of firearms to the Department of Commerce.

PUBLIC SUBMISSION

As of: 7/13/18 1:19 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945w-qoq7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0624

Public comment 856. Individual. Holly Dowling. 7-8-18

Submitter Information

Name: Holly Dowling

Address:

2481 Vineyard Rd
Novato, CA, 94947

Email: hollyd1225@gmail.com

Phone: 7072874409

General Comment

I am strongly opposed to this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is not in the best interests of the American public. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 1:16 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945x-b0na
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0623

Public comment 857. Individual. Julia Glover. 7-8-18

Submitter Information

Name: Julia Glover

Address:

7292 Maxwelton Road
Clinton, 98236

Email: julieg@whidbey.com

Phone: 3605793665

General Comment

No, no, NO!!!! This rule change would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I EXTREMELY STRONGLY OPPOSE this rule change which would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. For God's sake, WHAT ARE YOU THINKING????

PUBLIC SUBMISSION

As of: 7/13/18 1:13 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945x-eb8o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0621

Public comment 858. Individual. Linda Koenig. 7-8-18

Submitter Information

Name: Linda Koenig

General Comment

I oppose the change of the regulation of semi-automatic assault weapons and other firearms, and guidelines passed from the United States State Department to the Department Of Commerce. I think this is a very bad idea, and could increase the probability of these items passing to people who could harm Americans abroad. I don't think the Dept. of Commerce has the manpower, or ability to regulate and administer these transactions in a precise and thorough manner.

PUBLIC SUBMISSION

As of: 7/13/18 1:09 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945x-eirm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0616

Public comment 859. Individual. Amanda Wilcox. 7-8-18

Submitter Information

Name: Amanda Wilcox

Address:

Penn Valley, CA, 95946

Email: amandawilcox@live.com

General Comment

My 19 year old daughter was killed in a rampage shooting in 2001, so I know full well the tragic toll of gun violence. I also know that Americas gun homicide rate is more than 25 times the average of other high-income countries.

An analysis of gun homicide rates in developed countries those considered high-income by the World Bank found that the United States accounted for 46 percent of the population but 82 percent of the gun deaths.

The current proposal by the Trump administration would it easier to export U.S. guns and ammunition globally. I strongly object to America arming the world, especially with assault weapons and other powerful firearms. The proposal would move export licenses from the State Department to the Commerce Department. The Department of Commerce estimates that the transfer of authority will increase the number of export applicants by 10,000 annually.

I object to the proliferation of weapons used in war and crime in other countries. Specifically, I oppose the proposal for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have

substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

2. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

3. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

4. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

5. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Thank you for considering my objections and concern. I ask that you reject this proposal.

PUBLIC SUBMISSION

As of: 7/13/18 1:06 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945y-30t4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0615

Public comment 860. Individual. Patricia Barth. 7-8-18

Submitter Information

Name: Patricia Barth

Address:

1610 Riverwalk Xing

Charlottesville, VA, 22911

Email: barthpatricia@gmail.com

Phone: 3016132189

General Comment

I oppose this rule change that would put export of firearms under Commerce instead of State. Such a change would make our country less safe.

PUBLIC SUBMISSION

As of: 7/13/18 1:04 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945y-n8er Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0614

Public comment 861. Individual. Michael Ashton. 7-8-18

Submitter Information

Name: Michael Ashton

General Comment

Semi-automatic weapons are NOT military weapons! Military units use fully-automatic (aka machine guns).

Don't listen to the morons!

PUBLIC SUBMISSION

As of: 7/13/18 1:02 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945z-gv89
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0613

Public comment 862. Individual. Vera Gadman. 7-8-18

Submitter Information

Name: vera gadman

General Comment

Ioppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is an insane idea that Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

PUBLIC SUBMISSION

As of: 7/13/18 1:01 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-945z-ddyw Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0612

Public comment 863. Individual. Natalie K. 7-8-18

Submitter Information

Name: Natalie K

General Comment

I strongly oppose removing control of firearms, guns, ammunition and related articles from control under the United States Munitions list. This removal of control would decrease transparency and hamper the US Congress from automatically learning about and then deciding to block large sales of munitions to other countries or entities for national security purposes or because of human rights violations.

I do not think the Commerce dept has the staff or reach to adequately enforce export controls. This would result in some terrorist organizations and organized crime organizations gaining access to munitions that can be used against us.

Muddying the water only benefits the gun dealers and manufacturers and can only come back to harm US citizens.

PUBLIC SUBMISSION

As of: 7/13/18 12:53 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945z-yaaq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0611

Public comment 864. Individual. Pam Magidson. 7-8-18

Submitter Information

Name: Pam Magidson

General Comment

Thank you for the opportunity to comment on the Proposed Rule: International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III.

I am a citizen and taxpayer extremely concerned about gun violence and national security, and feel strongly that the handling of export licenses of semiautomatic assault weapons and other powerful firearms should remain with the U.S. State Department rather than move to the U.S. Commerce Department, for the following reasons: This rule would transfer gun export licensing to an agency whose principle mission is to promote trade. Both assault weapons and non-semi-automatic weapons are used in large numbers by criminals around the world. Their export should continue to be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The proposed rule would transfer the cost of processing licenses from gun manufacturers to us, the taxpayers. Registration fees that are used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So, we the taxpayers will absorb the cost of reviewing applications and processing licenses when it should remain a cost that gun exporters pay.

The rule reduces end-use controls for gun exports in several ways. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would eliminate registration of firearms exporters, which allows the State Department to check on an exporters history. Without use of this database, enforcement against arms trafficking will be seriously weakened. The Commerce Department does not compile information on human rights violations, so this rule would make it harder to deny weapons licenses to international human rights violators

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. Furthermore, Congressional oversight for important gun export deals would be eliminated. Congress will no longer be

automatically informed about sizable sales of these weapons. This would violate Congressional intent and effectively eliminate Congress proper role.

Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

What is perhaps scariest is that the proposed rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Please do not make it easier to export U.S. guns and ammunition globally by moving export licenses of semiautomatic assault weapons and other powerful firearms, given that U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in many nations. This seems to be a rule that would only benefit gun manufacturers, and that is plain wrong.

PUBLIC SUBMISSION

As of: 7/13/18 12:50 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945z-qalx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0610

Public comment 865. Individual. Kristopher Anonymous. 7-8-18

Submitter Information

Name: Kristopher Anonymous

General Comment

I think this is a terrible idea.

The proposed rule would consider semi-auto assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries. Civilian trade does not need need assault rifles of any sort.

This rule removes Congressional oversight for important gun export deals, reduces transparency and reporting on gun exports (which increases the risk of trafficking along with the removal of of statutory license requirements), shifts the cost of processing licenses from gun manufacturers to taxpayers, gets rid of or decreases many existing gun control efforts, encourages 3D printing of firearms, and transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

It seems practically designed to make gun trafficking more likely, harder to control, and more of a problem than it already is without expanding the resources for any agency to combat all these clear downsides.

PUBLIC SUBMISSION

As of: 7/13/18 12:48 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945z-qkzg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0609

Public comment 866. Individual. A.L. Steiner. 7-8-18

Submitter Information

Name: A.L. Steiner

General Comment

Treating semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries is unconscionable.

Do NOT:

- eliminate Congressional oversight for important gun export deals;
- transfer the cost of processing licenses from gun manufacturers to taxpayers;
- remove statutory license requirements for brokers, increasing risk of trafficking;
- reduce or eliminate end-use controls, such as State Depts Blue Lantern program, nor eliminate the registration of firearms exporters -- a requirement since the 1940s;
- enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms

As you know, the U.S. Commerce Department does not have the resources to enforce export controls, even now, so do NOT reduce transparency and reporting on gun exports. DO NOT transfer gun export licensing from an agency with mission to promote stability, conflict reduction and human rights, to an agency with mission to promote trade, for God's sake!

PUBLIC SUBMISSION

As of: 7/13/18 12:46 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945z-kdw0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0608

Public comment 867. Individual. Alex Skolny. 7-8-18

Submitter Information

Name: Alex Skolny

General Comment

We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

PUBLIC SUBMISSION

As of: 7/13/18 12:44 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-945z-w2nh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0607

Public comment 868. Individual. Nicholas Holt. 7-13-18

Submitter Information

Name: Nicholas Holt

Address:

7710 Winterset Dr.

Charlotte, 28270

Email: npholt@protonmail.com

Phone: 7047788949

Fax: 28270

General Comment

Please do not allow the distribution of instructions for 3D printing of firearms. This will benefit only criminals and other dangerous individuals and has no beneficial purpose. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 12:43 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9460-9vd6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0606

Public comment 869. Individual. Dede Goddard. 7-8-18

Submitter Information

Name: Dede Goddard

General Comment

Enough with the plethora of guns in this country...and now the NRA wants to take it worldwide. Just check the facts, we have more deaths due to gun violence than any other country. Studies have shown that the only reason for the huge number of deaths due to gun violence in the U.S. as compared with other countries, is simply the number of guns, period. Do the right thing and stop being influenced by the NRA's money!

PUBLIC SUBMISSION

As of: 7/13/18 12:42 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9460-5bbf Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0605

Public comment 870. Individual. John Richardson. 7-8-18

Submitter Information

Name: John Richardson

Address:

11 Sunview Circle
Arden, NC, 28704-9326

Email: jpr9@earthlink.net

Phone: 8287683520

Fax: 28704-9326

General Comment

I support the proposed rule promulgated under BIS-2017-0004. Sporting arms, ammunition, and parts are not "weapons of war" and should not be controlled under ITAR. Moreover, removing these items from the control of the State Department will remove the requirement that some gunsmiths get licensed under ITAR at an extraordinary cost for doing minor gunsmith modifications such as merely threading a barrel.

PUBLIC SUBMISSION

As of: 7/13/18 12:40 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9461-dbqt Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0604

Public comment 871. Individual. Mary A Leon. 7-8-18

Submitter Information

Name: Mary A Leon

Address:

5 Loop Street

San Antonio, TX, 78212-4231

Email: leon3@twc.com

Phone: 2102815787

General Comment

We the People deserve to be safe and secure in our homes, places of businesses and wherever we and our family are.

The LAST thing we need is to see automatic weapons be allowed to be sold to ANY American, no matter if they are mentally ill, abusive or have been incarcerated for crimes.

The beginning of the onslaught of weapons that can kill many people will end our safety and our RIGHTS as US Citizens!

PUBLIC SUBMISSION

As of: 7/13/18 12:39 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9461-nah1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0603

Public comment 872. Individual. Ann Armstrong. 7-8-18

Submitter Information

Name: Ann Armstrong

General Comment

Comments Re: Proposal for the United States to move oversight of export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department

I am a female senior citizen who, over a span of 76 years, has seen the sale and use of fire arms, especially assault-style weapons designed for military use, proliferate and the loss of life due to gun violence increase to a sickening and almost unimaginable level.

I vehemently oppose the proposal to move oversight of such weapons semi-automatic assault weapons, sniper rifles, and other powerful firearms not meant for use in hunting or other gun-related recreational sport, nor ever meant for self-defense from the State Department to the Commerce Department. Such weapons of war rightfully and logically belong under the purview of a military-oriented department. Further, removal of such weapons from the domain of the State Department is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms. If this proposal is allowed to be enacted, Congress will no longer be automatically informed about sizable sales of these weapons, weakening controls on who ends up with such weapons even lifting restrictions on 3D printing of guns and inevitably leading to people making their own how powered weapons.

This proposal is really a sop to the gun industry and the NRA, aiding them in opening international markets and exporting U.S. guns and ammunition globally without regulation, and will likely lead to more U.S. guns ending up in the hands of criminal organizations, human rights abusers, and terrorist groups. It is a cynical move that wholly ignores the needs and rights of American citizens to live free of the fear of gun violence. It will take the country backward in the fight to reduce gun violence rather than move us forward in our efforts to promote and secure the safety of our citizens.

Further, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. The gun exporters that benefit from these sales should bear this cost. National laws for brokers and financiers who arrange firearm shipments are a weak link in curtailing trafficking of small arms and light weapons. Firearms brokers would no longer be subject to US brokering laws which would make it easier for unscrupulous dealers to escape attention. The rule reduces end-use controls and public reporting on gun exports and human rights violations.

The transfer of licensing to Commerce will remove new exporters and brokers from the State Department database, weakening enforcement against arms trafficking. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The Commerce Department does not have resources, data, expertise or institutional relations to enforce export controls.

The proposed change will also reduce transparency and reporting on gun exports. It would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries. This rule would transfer gun export licensing to an agency the Commerce Department - whose principle mission is to promote trade.

Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights. Military assault style firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The export of these weapons should NOT be subject to weaker controls.

It is high time we stop kowtowing to the NRA and the gun lobby and start protecting our citizens rights to live free of fear of gun violence. I urge you in the strongest possible way to reject this proposal.

Ann H. Armstrong
Forest Park, Illinois 60130

PUBLIC SUBMISSION

As of: 7/13/18 12:37 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9461-5ma5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0602

Public comment 873. Individual. David Lyman. 7-8-18

Submitter Information

Name: David Lyman

General Comment

I am seriously concerned that any transfer of authority from the Department of State to the Commerce Department regarding the sale and shipping of any kind of firearms will bring a world of trouble to our country and to the rest of the world as well. The State Department has the resources and oversight to keep lethal weapons out of the hands of terrorists where the Commerce Department is all about supporting U S business without a keen focus on where the guns will go and what will they be used for. Our world is already awash in guns of all types and we don't need less oversight - we need much more. I would demand that the State Dept. should be given further powers to monitor overseas firearm sales. Commerce should be concerned with non lethal products and commodities and supporting our businesses who trade in products other than firearms.

NO to the transfer of authority from State to Commerce regarding fire arms sales.

PUBLIC SUBMISSION

As of: 7/13/18 12:35 PM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9462-ridy Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0601

Public comment 874. Individual. Lisa Fitz. 7-8-187

Submitter Information

Name: Lisa Fitz

General Comment

I strongly oppose transfer of regulation of firearms sales abroad from the State Dept. (diplomacy) to the Dept. of Commerce (business). Selling arms to foreign countries or groups is a potential threat to USA safety. We do not need to have the Dept. of Commerce encouraging sales of firearms to foreign hostile governments or groups.

In these times, we must love God above all else and love our neighbors as ourselves. Love is the answer. Not greed, not hate, not fear.

PUBLIC SUBMISSION

As of: 7/13/18 12:31 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-csju
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0600

Public comment 875. Individual. Christopher Lish. 7-8-18

Submitter Information

Name: Christopher Lish

General Comment

Sunday, July 8, 2018

Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

Subject: Do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department -- Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) (Docket ID: BIS-2017-0004-0001)

To: Secretary of Commerce Wilbur Ross, Under Secretary of Commerce for Industry and Security Eric L. Hirschhorn, and Assistant Secretary for Export Administration Richard E. Ashooh,

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

As you are aware, firearms exports are currently classified as "military and are under the jurisdiction of the State Department. Congress can also block sales of large batches of firearms to foreign countries. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines, Saudi Arabia, and Turkey.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have sufficient staff, let alone staff in every nation around the world. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would also make the world a far more dangerous place because:

- 1) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3) It would remove the State Departments block on the 3-D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3-D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3-D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3-D printing of firearms in the U.S. and around the globe.

I strongly urge you to reject this proposed rule change.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
San Rafael, CA

PUBLIC SUBMISSION

As of: 7/13/18 12:29 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-6tfp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0599

Public comment 876. Individual. Laura Klauke. 7-8-18

Submitter Information

Name: Laura Klauke

Address:

1203 Keith Drive

Cary, NC, 27511

Email: ldklauke@gmail.com

General Comment

I am opposed to this proposed rule change. Instead, the Administration should consider other alternatives to better balance the important interests at stake.

Specifically:

I am opposed to the elimination of the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

I am opposed to the removal of licensing requirements for brokers because it will increase the risk of trafficking.

I am opposed to the removal of the State Departments block on the 3D printing of firearms. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

PUBLIC SUBMISSION

As of: 7/13/18 12:27 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-7104
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0598

Public comment 877. Individual. Erin Anonymous. 7-8-187

Submitter Information

Name: Erin Anonymous

General Comment

I live in Oregon and not only care about the safety of people near gun bearers in this state but in the other states and Commonwealths of America, and it's allies around the world. I'm very concerned with human rights and how unstable governments have been successful in procuring weapons from sources, possibly the US, and determined at some point in time to use them to harm dissenting civilians, unliked minority groups or portions of their country's population, or even destitute refugees from neighboring unstable countries. Congress, because it is the only power the people have besides a basic vote, should be able to review the movement or sale of weapons to countries outside the US. Congress should have the power of oversight on these arms because they are able to represent us and our requests to our elected officials and some shipments may need to be rejected for society's sake.

The proposed rule treats semi-automatic assault rifles as non-military" which is a terrible decree given the years and decades of work people have given to make this society safer and more supportive of human survival and fulfillment. This proposed rule would allow guns to go places completely circumventing our desire for moral standards of living and safety we have wanted for our own society and in addition, for other societies as well. These are military weapons and should be labeled as such because we should be a country that cares other countries don't have the opportunity to harm themselves as they learn to build societies supportive of human life and fulfillment necessary for each human's health, we should care they don't get the atom bomb, the weapons that wreak chaos, and the approval of us to do it.

PUBLIC SUBMISSION

As of: 7/13/18 12:25 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-wzyq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0597

Public comment 878. Individual. Candice Stewart. 7-9-18

Submitter Information

Name: Candice Stewart

Address:

Noxon, MT, 59853

General Comment

to whom it may concern,

The United States needs to check for pre-licensing and Post Shipment Inspections need to be conducted, No firearms should be exported without being documented. In turn, keeping down the gun trafficking.

To add flame to the fire is the 3D print clause, this clause SHOULD BE eliminated, how would we control gun sales if it is not?

Strike the 3D clause.

Please, stay informed of Weapons leaving the United States, who knows who's hands they will wind up in. There are too many serious concerns about Human Rights and wildlife safety to consider, do not be hasty in your decision.
Thank You.

PUBLIC SUBMISSION

As of: 7/13/18 11:23 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9464-v63q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0586

Public comment 879. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly oppose moving this export license oversight for firearms from the Department of State to the Department of Commerce. How could this proposed rule intend to classify semiautomatic assault rifles as non-military? The reduction of transparency and reporting on gun exports is haunting, knowing how much of our manufactured weapons have been sold to international armies and police forces known for their human right violations.

This proposed rule intends to prioritize the commercial expansion of the gun manufacturing market over the lives it has the potential to massacre. These weapons need to be accounted for and eliminating transparency would be an antithesis to public safety within and outside of the United States.

As a citizen of this country, I strongly oppose diversifying the commercial portfolio of what US gun manufacturers and gun shop owners can solicit because it threatens other countries with the flooding of semiautomatic assault rifles and other weapons that would be declassified.

Thank you for considering my voice.

PUBLIC SUBMISSION

As of: 7/13/18 12:23 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-uwh3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0596

Public comment 880. Individual. Johanna McConnell. 7-8-18

Submitter Information

Name: Johanna McConnell

Address:

4398 E. Entrada

Beavercreek, OH, 45431

Email: Jyoungmcconnell@gmail.com

Phone: 9374267394

General Comment

It is immoral to sell US made guns abroad. Those guns will be purchased by criminal gangs and used against law enforcement and US soldiers. The only reason Trump is promoting this idea is to gain support from NRA so they will donate to future campaigns.

PUBLIC SUBMISSION

As of: 7/13/18 12:08 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-imds
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0595

Public comment 881. Individual. Meggin Lane. 7-8-18

Submitter Information

Name: Meggin Lane

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake. I would like our legacy, as the United States of America, to be that we made the world a safer place to live rather than create an increase in the level of violence in which the world is already dealing.

PUBLIC SUBMISSION

As of: 7/13/18 12:06 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-ow5v
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0594

Public comment 882. Individual. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose changing the oversight of exportation of guns such as the AR-15 and other weapons from State Department to Commerce.

A major reasons for the massive rate of emigration from many countries to the US and Europe is warfare due to civil war or war with the drug cartels. Had America & Russia not exported so many guns many of these people might be living in more peaceful countries. Unfortunately we have already sent enough guns. Giving the Commerce Department free reign to increase guns sales does not make the world a safe place. Gun manufacturers and exporters are responsible for the dangerous world we live in.

I would be in favor of greater restriction on the export of guns. Also greater taxation of gun manufacturing is logical to pay for the damage they have created.

PUBLIC SUBMISSION

As of: 7/13/18 12:04 PM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9462-wowz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0593

Public comment 883. Individual. Lynn Gravelle. 7-8-18

Submitter Information

Name: Lynn Gravelle

General Comment

I oppose the rules change that would move the handling of export licenses of powerful firearms from the U.S. State Department to the U.S. Commerce Department. The Commerce Department does not have the experience and resources to adequately enforce export control. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/13/18 11:57 AM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9463-xy3t
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0592

Public comment 884. Individual. Susan Olinger. 7-8-18

Submitter Information

Name: Susan Olinger

Address:

11312 Woodbrook Lane

Reston, VA, 20194

Email: s.olinger1918@gmail.com

Phone: 7039048226

Fax: 20194

General Comment

I am writing to express my vehement opposition to moving export license oversight for firearms from the U.S. Department of State to the U.S. Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is clearly inconsistent with the undeniable reality that our troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

Our government should not be making it easier to trade/export weapons that are likely to be used in other countries by organized crime, terrorism, human rights violations, and political violence. It is inappropriate and shameful that the proposal would, in effect, use the Commerce Department to promote trade in such weapons to kill human beings abroad. Abroad, our country already has the reputation as being overrun with guns; so our solution is to make it easier to export these weapons? The current gun export licensing oversight under the State Department is appropriate as that agency's mission is promoting stability, conflict reduction, and human rights.

In addition to reducing transparency and reporting on gun exports, the proposed rule also would: eliminate Congressional oversight for important gun export deals; transfer the cost of processing licenses from gun manufacturers to taxpayers; and, enable unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

Shameful.

PUBLIC SUBMISSION

As of: 7/13/18 11:55 AM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9463-cd4z
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0591

Public comment 885. Individual. Sharon Conway. 7-8-18

Submitter Information

Name: sharon conway

General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I think it is foolish to more away from safeguarding our nation to promoting the business of MORE gun sales.

PUBLIC SUBMISSION

As of: 7/13/18 11:53 AM Received: July 08, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9463-ewnh Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0590

Public comment 886. Anonymous. 7-8-18

Submitter Information

Name: Anonymous Anonymous

General Comment

It should be illegal to import firearms from another country and it should be illegal to export firearms from another country.

PUBLIC SUBMISSION

As of: 7/13/18 11:51 AM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9463-3mf9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0589

Public comment 887. Individual. Enid Cardinal. 7-9-18

Submitter Information

Name: Enid Cardinal

Address:

8250 Dunham Road
Baldwinsville, 13027

Email: enid0411@yahoo.com

Phone: 3156350097

Fax: 13027

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

1 It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

2 It would remove licensing requirements for brokers, increasing the risk of trafficking.

3 It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully

charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Please take all this into consideration before you would take the extremely dangerous step.

Thank you.

Enid Cardinal

PUBLIC SUBMISSION

As of: 7/13/18 11:33 AM
Received: July 08, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9463-2k5w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0588

Public comment 888. Individual. Janet Moore. 7-9-18

Submitter Information

Name: Janet Moore

General Comment

We should be adding controls on weapons and ammunition, and accessories that increase the firepower of weapons. The increase in rampant killing of innocent people should be a glaring warning that our lawmakers are failing the people of the United States, especially failing our children! Stop being swayed by greedy manufacturers and pro-violence gun lobbies.

PUBLIC SUBMISSION

As of: 7/13/18 11:30 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9464-ea2j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0587

Public comment 889. Individual. Paul Cardinet. 7-9-18

Submitter Information

Name: Paul Cardinet

General Comment

Do not make it easier to sell, ship or export any type of firearm, or ammunition.

This is not the type of business this country needs to be engaged in.

These weapons only make the world a worse place to live in, and frequently these weapons end up being used against US citizens.

Make the regulations stronger to help bring about a more peaceful world

PUBLIC SUBMISSION

As of: 7/13/18 11:21 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9464-r37n
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0585

Public comment 890. Individual. D Foster. 7-9-18

Submitter Information

Name: D Foster

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Semiautomatic assault weapons and other powerful firearms are clearly military and as such must continue to be under the regulation of the State Department and to allow Congress the ability to block sales of large batches of firearms to foreign countries in the name of national security, and to countries where there are serious human rights concerns. The Commerce Department just does not have the resources to adequately enforce export controls; firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The rule change would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe, which is a terrible idea. This rule change would make both the US and the world a far more dangerous place.

Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 11:02 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9465-r5y5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0584

Public comment 891. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

This proposal would inevitably lead to many more deaths, suffering and subjugation of innocent citizens. Please do not endorse this proposal.

PUBLIC SUBMISSION

As of: 7/13/18 11:00 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-9465-ojk3 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0583

Public comment 892. Individual. Patti Gorman. 7-9-18

Submitter Information

Name: Patti Gorman

General Comment

I oppose the regulation that would put firearms under the control of the Department of Commerce instead of the Department of Defense. he ramifications are dangerous and serious.

PUBLIC SUBMISSION

As of: 7/13/18 10:58 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9468-33oq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0582

Public comment 893. Individual. Andrew Walcher. 7-9-18

Submitter Information

Name: Andrew Walcher

Address:

12735 Via Esperia
Del Mar, CA, 92014

Email: dre_walsh@yahoo.com

Phone: 7737328326

General Comment

I am writing to oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. Firearms are weapons of war and tight restrictions should be maintained on which foreign entities can have access to these.

The current rules automatically informing Congress about sizable weapons sales is critical to keep military-grade hardware from falling into the hands of regimes which pose serious human rights concerns towards their people, or those which would pass these weapons along to terrorist organizations.

The Commerce Department does not have the resources to adequately enforce export controls as its Bureau of Industry and Security does not have staff everywhere. This means we will be relying on the same industry self-regulation which has produced the disastrous US domestic firearms policy. In short, profit will be placed over national security.

The only reason the gun industry wants to eliminate the Blue Lantern program and have Commerce oversee exports is because it will enable them to further flout the rules in place. We cannot allow them to do this.

PUBLIC SUBMISSION

As of: 7/13/18 10:54 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9468-5icz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0581

Public comment 894. Individual. Thom F. 7-9-18

Submitter Information

Name: Thom F.

General Comment

The State Department must retain control over firearms exports. Gun manufacturers would sell weapons to just about anyone - including terrorists - if not restrained by some meaningful controls. The Commerce Department is an inappropriate venue for such controls.

PUBLIC SUBMISSION

As of: 7/13/18 10:43 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946b-rk5c Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0580

Public comment 895. Individual. Rich Kunkel. 7-9-18

Submitter Information

Name: rich kunkel

Address:

wadsworth, OH, 44281

Email: sgtrichusmfc@gmail.com

Phone: 3303345370

General Comment

I am against this regulation, it has no sense and no commonality. People do NOT want easier access to more guns! This is poorly drafted, and thought out by someone who works for the NRA, NOT the American people. Against this!!!

PUBLIC SUBMISSION

As of: 7/13/18 10:41 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946b-3hm2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0579

Public comment 896. Individual. Janice Valder. 7-9-18

Submitter Information

Name: Janice Valder

General Comment

I am opposed to this. You are taxing me to allow semi-automatic weapons to be sent with little or less regulation two countries that already have the highest crime rate and Americans are often warned to not travel there. I asked you as a Department of Commerce to look carefully at what and why you are a part of our federal government and then vote this policy down.

PUBLIC SUBMISSION

As of: 7/13/18 10:40 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946c-hf86 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0578

Public comment 897. Individual. Gordon Scott. 7-9-18

Submitter Information

Name: gordon scott

Address:

1516 s fairfield dr
pensacola, 32507

Email: gordonscott269@yahoo.com

Phone: 8505258208

Fax: 32507

General Comment

keep the agency that regulates gun sales as it is now as this will protect our nation

PUBLIC SUBMISSION

As of: 7/13/18 10:37 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946c-jse1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0577

Public comment 898. Individual. Roselie Bright. 7-9-18

Submitter Information

Name: Roselie Bright

General Comment

Because my faith calls on me to protect all people I oppose moving gun export licensing from the State Department to the Commerce Department. The State Department is better equipped to keep guns out of the hands of terrorists that want to harm people, including Americans.

PUBLIC SUBMISSION

As of: 7/13/18 10:35 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946d-z19p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0576

Public comment 899. Individual. Tucker Respass. 7-9-18

Submitter Information

Name: Tucker Respass

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department vigorously oppose the rule changes that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Such trade must be factored into international interactions and diplomacy. It is not simply a matter of commerce. Further, the proposals to cease licensing would make arms too easily trafficked, especially without at least as much inspection as has been conducted with State Department oversight. And there should never be 3D reproduction of guns of any size of fire-power.

Tucker Respass

PUBLIC SUBMISSION

As of: 7/13/18 9:49 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946d-wg3f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0551

Public comment 900. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security.

PUBLIC SUBMISSION

As of: 7/13/18 9:47 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946d-wuvb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0549

Public comment 901. Individual. Edward Schortman. 7-9-18

Submitter Information

Name: Edward Schortman

Address:

401 East Woodside Drive
PO Box 291
Gambier, OH, 43022

Email: schortma@kenyon.edu

Phone: 7404272484

Fax: 43022

General Comment

I am deeply concerned by the proposed shift from the State Department to the Department of Commerce in the handling of export licenses for semi-automatic assault weapons. This appears to be a blatant effort to promote the sale of these instruments of death abroad, thereby compensating gun manufacturers for the loss of sales at home. This naked advancement of the interests of the gun lobby will only result in more guns in the hands of more people some of whom will certainly use these weapons against our troops and civilians. Haven't we bowed down deeply enough to the gun lobby already? How many more people at home and abroad have to die in order to enrich a few gun manufacturers? Please keep the granting of export licenses for semi-automatic weapons in the hands of the State Department whose primary job is to protect all of us, not just a few gun manufacturers.

PUBLIC SUBMISSION

As of: 7/13/18 9:45 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946d-s0uo Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0547

Public comment 902. Individual. Stephen Johnson. 7-9-18

Submitter Information

Name: Stephen Johnson

Address:

San Diego, CA, 92117

Email: sejn@att.net

Phone: 8585410528

General Comment

Please stop these sales of weapons.

PUBLIC SUBMISSION

As of: 7/13/18 9:44 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946d-kd88
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0544

Public comment 903. Individual. Pamela Albers. 7-9-18

Submitter Information

Name: Pamela Albers

General Comment

I am a 60 year old American citizen who is sickened by the unnecessary violence perpetuated by the availability of weapons.

I am opposed to the proposed rule change for the following reasons:

The proposed rule change treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

The proposed rules are bad policy and encourage bad conduct.

PUBLIC SUBMISSION

As of: 7/13/18 9:42 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946e-y5i9 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0542

Public comment 904. Individual. Karyn Barry. 7-9-18

Submitter Information

Name: karyn barry

Address:

Waltham, MA, 02451

Email: karynbarry@yahoo.com

Phone: 7818946000

General Comment

The U.S. should not be in the business of exporting guns and weapons. This is totally shameful and immoral.

PUBLIC SUBMISSION

As of: 7/13/18 9:37 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946e-dqvp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0536

Public comment 905. Individual. Jennifer Messina. 7-9-18

Submitter Information

Name: Jennifer Messina

General Comment

Oh my, money, money, money. For some it is all there is. NRA and their compulsive greed. This idea sounds like it could come back and bite us in the rear. Young American military personnel facing arms sold by the NRA. I say leave it the way it is.. Our present president is a nut job please don't follow his determinations.

PUBLIC SUBMISSION

As of: 7/13/18 9:35 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946e-suoo Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0533

Public comment 906. Individual. Dinmani Savla. 7-9-18

Submitter Information

Name: dinmani savla

Address: United States,

Email: dsa_94040@yahoo.com

General Comment

I oppose the rule change that would switch regulations of firearms export from the U.S. State Department to the U.S.Commerce Department. This change will jeopardize the safety of us, constituents. It is so shameful that this administration is more interested in its colluded interests than country's and its residents' security.

PUBLIC SUBMISSION

As of: 7/13/18 9:33 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946e-yv03
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0531

Public comment 907. Individual. William Walls. 7-9-18

Submitter Information

Name: William Walls

Address:

6430 22nd St N
Arlington, 22205

Email: WallsWJ@hotmail.com

Phone: 7035333276

Fax: 22205

General Comment

To whom it may concern:

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Switching the regulation of firearms exports to Commerce would facilitate firearms exports to oppressive regimes, remove safeguards that help keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and exacerbates the worldwide refugee crisis.

William J. Walls

PUBLIC SUBMISSION

As of: 7/13/18 9:32 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946e-dnw1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0529

Public comment 908. Individual. Amy Veltman. 7-9-18

Submitter Information

Name: Amy Veltman

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms trade should clearly be regulated by an organization responsible for our national security above profit. We don't want our arms getting in the hands of bad actors.

PUBLIC SUBMISSION

As of: 7/13/18 9:30 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946f-oy96 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0528

Public comment 909. Individual. Amber Eby. 7-9-18

Submitter Information

Name: Amber Eby

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Thank you for doing the right thing to keep us safe.

PUBLIC SUBMISSION

As of: 7/13/18 9:29 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946f-lp90 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0527

Public comment 910. Individual. Nancy Barrineau. 7-9-18

Submitter Information

Name: Nancy Barrineau

Address:

901 W Church St

Laurinburg, NC, 28352

Email: nwbarrineau@gmail.com

Phone: 9103181178

Fax: 28352

General Comment

The proposed gun rule change would benefit the NRA while making the world a far more dangerous place for the rest of us.

By eliminating the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; removing licensing requirements for brokers, increasing the risk of trafficking; and removing the State Departments block on the 3D printing of firearms.

Please protect us. Protect the rest of the world, too. Thank you. I vote!

PUBLIC SUBMISSION

As of: 7/13/18 9:27 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946f-dquj Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0526

Public comment 911. Individual. Noella Poinsette. 7-9-18

Submitter Information

Name: Noella Poinsette

Address:

291 Hayes St. #8,
Holland, 49424

Email: npoinsette@yahoo.com

Phone: 6164035265

Fax: 49424

General Comment

We should not be exporting more guns especially guns of the same type that our military uses and the licensing should not be transferred to an agency the Commerce Department that already cannot fulfill its responsibilities. Licensing needs to stay with the State Department which is more focused on the harm that these weapons do to our citizens abroad and citizens of other countries.

A 2nd reason I am strongly opposed to these proposed changes is that congressional oversight would effectively be eliminated. This is extremely important because without such oversight nobody would have been aware of the scope of recent human rights violations in the Philippines or in Turkey.

We as a country need to continue to stand up for the dignity of each person - a dignity that is far more important than a few people or companies making money off of an increase in violence and killing.

PUBLIC SUBMISSION

As of: 7/13/18 9:26 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946f-g9es
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0524

Public comment 912. Individual. Laurel Cameron. 7-9-18

Submitter Information

Name: Laurel Cameron

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This would change the focus on protecting our nation and promoting firearm safety to promoting the sale of guns throughout the world. We have such an epidemic of gun violence due to the easy access of powerful weapons, this is not a problem we should be exporting to the rest of the world. Making this change has serious negative ramifications for our nation's safety, with little chance of ever repairing the harm. We cannot allow profit to be the prime driver when it comes to weaponry.

PUBLIC SUBMISSION

As of: 7/13/18 9:24 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946f-jms9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0523

Public comment 913. Individual. Mark Schneegurt. 7-9-18

Submitter Information

Name: Mark Schneegurt

General Comment

I am a registered Republican from Kansas and I always vote. I stand with the students from Parkland and want to limit gun violence with common sense laws and regulations. Let's not follow the bad practices of Ollie North (the criminal) head of NRA.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military.

The proposed rule would eliminate Congressional oversight for important gun export deals.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons.

The rule reduces end-use controls for gun exports.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.

The proposed change will reduce transparency and reporting on gun exports.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

PUBLIC SUBMISSION

As of: 7/13/18 9:20 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946g-4ln1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0522

Public comment 914. Individual. Hollye Dexter. 7-9-18

Submitter Information

Name: Hollye Dexter

General Comment

My name is Hollye Dexter. I am on the board of directors for Women Against Gun Violence and have experienced the scourge of gun violence in my own family. I vehemently oppose the transfer of oversight of firearms export from the state to commerce department. Guns kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. This will only send more asylum seekers fleeing to our borders. And then what? We lock them up and take their children? This is a terrible and dangerous proposal only created to put money in the gun lobby's pockets.

PUBLIC SUBMISSION

As of: 7/13/18 9:18 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946g-iz4j Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0521

Public comment 915. Individual. Joann Hagen. 7-9-18

Submitter Information

Name: Joann Hagen

Address:

402 E Main St
Decorah, IA, 52101

General Comment

We are very much opposed to weakening the requirements for military gun sales overseas. We do not agree with the NRA that everyone in the USA and world needs an assault weapon. We oppose the movement from the state dept and will lobby against it.

PUBLIC SUBMISSION

As of: 7/13/18 9:17 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946g-1lhp Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0520

Public comment 916. Individual. Ruth Lombard. 7-9-18

Submitter Information

Name: Ruth Lombard

Address:

Sonoma, CA, 95476

Email: hunbard@gmail.com

Phone: 707 996-7457

General Comment

Moving handling of export licenses of semiautomatic assault weapons and other firearms from the U.S. State Department to the U.S. Commerce Department. Gun violence is a problem around the world, and certainly within the United States. There is no way to guarantee how semiautomatic weapons would be used in other countries. Turning export licenses over to an agency that promotes U.S. products, rather than considering the use of the product would be a detriment to U.S. and world citizens.

PUBLIC SUBMISSION

As of: 7/13/18 9:15 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946g-8m24
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0519

Public comment 917. Individual. William Marsh. 7-9-18

Submitter Information

Name: William Marsh

Address:

3549 Lowell Street
San Diego, CA, 92106

Email: wmarsh@cox.net

Phone: 619-694-9529

General Comment

I am opposed to the transfer of oversight of firearms exports from the State Department to the Commerce Department. Firearms are weapons of war. The State Department is tasked with relations with other countries and the reduction of violent conflict in the world. The State Department is in a position to know the political ramifications of shipping weapons of war to any particular country, and therefore should be in charge regulating the sale of such weapons of war. The sale of such weapons should remain under control of the USML.

PUBLIC SUBMISSION

As of: 7/13/18 9:13 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946g-fktm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0518

Public comment 918. Individual. Kate Kizer. 7-9-18

Submitter Information

Name: Kate Kizer

General Comment

I'm an expert on civilian harm and the arms trade, and I write to urge you to reject this dangerous proposal because:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, and US troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate arms exports.
2. The proposed rule would eliminate Congressional oversight for gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons, which will limit its ability to comment on related human rights concerns. Items moved to Commerce control would no longer be subject to the statutory required congressional notification for sales of firearms regulated by the US Munitions List valued at \$1 million or more. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing, leaving the government i.e. taxpayers to absorb the cost of reviewing applications and processing licenses.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts

to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

5. The rule reduces end-use controls for gun exports. It would eliminate the States Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. End-use controls also are weakened by eliminating registration of firearms exporters. Registration of exporters allows State to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. Transferring licensing to Commerce will remove new exporters and brokers of these firearms from State's database, weakening enforcement.

6. The rule enables unchecked gun production in the US and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the US and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce. The BISs enforcement office, with no staff in other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, State has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance the Commerce does not.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by State, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/13/18 9:08 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-rws3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0517

Public comment 919. Individual. Rebecca Gould. 7-9-18

Submitter Information

Name: Rebecca Gould

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It poses grave concerns for our national security and the security of people around the world.

PUBLIC SUBMISSION

As of: 7/13/18 9:07 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-kx6w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0516

Public comment 920. Individual. Christy Milam. 7-9-18

Submitter Information

Name: Christy Milam

General Comment

I oppose the the Trump administration proposal to move the make it easier to export U.S. guns and ammunition globally. By transferring the authority from the State Department to the Commerce Department, the number of exports applicant will increase by 10,000 annually. This includes assault weapons and other powerful firearms! This change in policy is problematic because it:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

PUBLIC SUBMISSION

As of: 7/13/18 9:05 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-dan7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0515

Public comment 921. Individual. Al Lindsey. 7-9-18

Submitter Information

Name: Al Lindsey, M.D.

Address:

4711 Lookout Mountain Cove
Austin, TX, 78731

Email: alind88@gmail.com

Phone: 5129231687

General Comment

The supervision of Firearms and Related Articles should NOT be transferred to The Dept. of Commerce. The rules in place under The State Dept. should be maintained so that FEWER, not more, assault-type weapons and armor-piercing bullets are exported to other countries. These war weapons and cop-killer bullets are too dangerous to be in ANYONE'S hands who is not military or in law enforcement, IMHO as a Vietnam Veteran and life-long hunter and gun owner.

PUBLIC SUBMISSION

As of: 7/13/18 9:04 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-xzxy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0514

Public comment 922. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so that public may understand the impact of these rules and potential firearm exports. Also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: 7/13/18 9:02 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-64kq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0513

Public comment 923. Individual. Nicole Clarke. 7-9-18

Submitter Information

Name: Nicole Clarke

General Comment

I oppose the proposed rule, as it loosens the regulation of gun exports and increases the risk that military-style weapons land in the hands of international criminals. The proposed rule dramatically changes the regulatory structure for firearm exports and appears largely driven by the interests of the firearms industry. Notably, the proposed rule decreases transparency to Congress and the public. I urge you to reject the proposed rule as currently drafted.

PUBLIC SUBMISSION

As of: 7/13/18 9:00 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946h-iic0 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0512

Public comment 924. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Stop selling guns to every nut who wants one.

PUBLIC SUBMISSION

As of: 7/13/18 8:57 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946h-6jsr Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0511

Public comment 925. Individual. Stephen Lane. 7-9-18

Submitter Information

Name: Stephen Lane

Address:

Bethesda MD, United States, 20816

Email: atticlane@yahoo.com

Phone: 5712214120

General Comment

I oppose this, or any other, rule change that would move the regulations of firearms export from the State Department to any other agency. That change would encourage firearms sales to entities that we all agree should not have them, such as oppressive political regimes, criminals and terrorists in other countries. The resulting increase in violence would not only destabilize those countries, but encourage mass migration to the United States, both undesirable outcomes.

PUBLIC SUBMISSION

As of: 7/13/18 8:55 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-drmj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0510

Public comment 926. Individual. Kathleen Kelcey. 7-9-18

Submitter Information

Name: Kathleen Kelcey

General Comment

I am in opposition to this or any rule change that would remove arms sales, gun sales, of any kind from the purview of the US State Department. This rule change is not in the country's best interest.

PUBLIC SUBMISSION

As of: 7/13/18 8:54 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946h-abow
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0509

Public comment 927. Individual. Kamella Tate. 7-9-18

Submitter Information

Name: Kamella Tate

General Comment

I come from many generations of responsible rural gun owners. There are times and places where gun ownership and use are critical; however, I find the proposal to ease restrictions on the exportation of guns and ammunition from the United States to be abhorrent. We struggle enough with gun violence in our own country, that the gun industry and the NRA are pushing to embed that struggle in other communities just to increase sales and profits is poisonous and amounts to nothing more than greed run amuck. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls, not fewer.

PUBLIC SUBMISSION

As of: 7/13/18 8:53 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946i-i6fr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0508

Public comment 928. Individual. Sarah Fishback. 7-9-18

Submitter Information

Name: Sarah Fishback

General Comment

I am concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. I am also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms.

Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: 7/13/18 8:51 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946i-iujn Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0507

Public comment 929. Individual. Sherry Blanton. 7-9-18

Submitter Information

Name: Sherry Blanton

Address:

549 Florida Ave T-3
Herndon, VA, 20170

Email: sherryblanton2@cox.net

Phone: 703-447-2365

General Comment

Please do not switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are not just merchandise made and sold to profit businesses; they are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/13/18 8:50 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946i-xtey Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0506

Public comment 930. Individual. Jacqueline Zeller. 7-9-18

Submitter Information

Name: Jacqueline Zeller

Address: United States,

General Comment

I strongly oppose this change to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. If the entire premise is that firearms should be used a means of protection they should be regulated as such, not as a means for profit. Supporting the right the bear arms is separate from promoting the distribution of such to foreign lands. The Commerce Department is not currently setup to appropriately monitor, and control the sale and distribution of munitions. Please do not move forward with this rule change. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 8:49 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946i-b4h0 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0505

Public comment 931. Individual. Jay Gregory. 7-9-18

Submitter Information

Name: Jay Gregory

Address:

11000 Cameron Ave
Oakland, CA, 94605

Email: djaustingregory@yahoo.com

General Comment

Please do not authorize more sales of guns abroad by America gun companies!

PUBLIC SUBMISSION

As of: 7/13/18 8:47 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946i-swmx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0504

Public comment 932. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

U.S. gun manufacturers -- and their lobbying machine, the NRA -- are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Dept. to the U.S. Commerce Dept.

The mission of the U.S. State Dept. is to safeguard our country. The mission of the U.S. Commerce Dept. is to promote U.S. businesses.

The handling of export licenses (for powerful firearms) by the U.S. Commerce Dept. would promote more gun violence and unnecessary wars abroad, and it would compromise U.S. national security.

Please keep the U.S. State Dept. in charge of handling of export licenses for powerful firearms.

Thank you for your consideration on this matter.

PUBLIC SUBMISSION

As of: 7/13/18 8:46 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946i-1tce Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0503

Public comment 933. Individual. R. Catania. 7-9-18

Submitter Information

Name: R. Catania

General Comment

I oppose vehemently this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not change the rule.

PUBLIC SUBMISSION

As of: 7/13/18 8:44 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946i-wxai
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0502

Public comment 934. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Please do not go ahead with the proposal to export license oversight for firearms from the Department of State to the Department of Commerce. I object to this rule change because it depends on defining semiautomatic assault rifles as non-military" even though U.S. troops routinely use their military rifles in semiautomatic mode and civilians are not allowed to possess such weapons many countries. I also find this proposal problematic because it reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

PUBLIC SUBMISSION

As of: 7/13/18 8:43 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946i-e9hk Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0501

Public comment 935. Individual. Terry Kosobud. 7-9-18

Submitter Information

Name: TERRY KOSOBUD

Address:

4612 Steed Drive

AUSTIN, TX, 78749

Email: tpkosobud@gmail.com

Phone: 8472243566

Fax: 78749

General Comment

I oppose this change in rules. Control of guns should remain within the US Department of State. The US government should not be in the business of trying to promote gun sales abroad. There is enough evidence that easy access to guns results in innocent people being killed.

PUBLIC SUBMISSION

As of: 7/13/18 8:35 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946i-xkcs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0500

Public comment 936. Individual. Danielle Machotka. 7-9-18

Submitter Information

Name: Danielle Machotka

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please do not institute this change.

PUBLIC SUBMISSION

As of: 7/13/18 8:34 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946j-ooco
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0499

Public comment 937. Individual. Rob Gregson. 7-9-18

Submitter Information

Name: Rob Gregson

General Comment

I strongly oppose this move away from regulation under the United States Munitions List. I believe both the national and personal security of our allies and neighbors means that gun sales and licensing need to remain firmly in the hands of experienced diplomats and other staff of the US State Dept.

Sincerely,
Rev. Rob Gregson
Summit, NJ

PUBLIC SUBMISSION

As of: 7/13/18 8:33 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946j-wpy8
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0498

Public comment 938. Individual. Rev. Rob Gregson. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I am strongly in favor of the control of firearms sales outside the United States to remain under the control of the US Munitions List. It is the purview and expertise of the State Dept. to regulate and manage the sale of weaponry to foreign states, not the US Commerce Dept.

Sincerely,
Rev. Rob Gregson
Summit, NJ

PUBLIC SUBMISSION

As of: 7/13/18 8:31 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946j-6uhw Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0497

Public comment 939. Individual. Ann L. 7-9-18

Submitter Information

Name: Ann L

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The world doesn't need more firearms. We need to spend our energy, time and money and resources on children, education, healthcare, alternative energy, among many other things. Shipping more guns to other countries will only make our own country less safe.

Also, my dear friend was killed by a gun accidentally almost 20 years ago. He was meticulous about how he handled guns, and was very safe with them. Unfortunately, accidents still happen, and I will never see him again. I don't wish the experience of losing a loved one to a gun on anyone.

PUBLIC SUBMISSION

As of: 7/13/18 8:27 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946j-7lea
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0496

Public comment 940. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I strongly OPPOSE the proposed rule.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/13/18 8:25 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946j-d3on
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0495

Public comment 941. Individual. Everard Davenport. 7-9-18

Submitter Information

Name: Everard Davenport

General Comment

I am deeply troubled by this proposed rule governing article which may be used t kill human beings, primarily because it

- 1) Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- 2) Eliminates Congressional oversight for important gun export deals.
- 3) Removes statutory license requirements for brokers, increasing risk of trafficking.
- 4) Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- 5) The Commerce Department does not have the resources to enforce export controls, even now.
- 6) Reduces transparency and reporting on gun exports.
- 7) Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

One is merely offensive - the cost of licenses should be borne by end users and not transferred to the rest of us.

PUBLIC SUBMISSION

As of: 7/13/18 8:23 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946j-zwhy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0494

Public comment 942. Individual. Margaret Peeples. 7-9-18

Submitter Information

Name: margaret Peeples

Address:

838 Heather lane
charlotte, NC, 28209

Email: peeplesmargaret@gmail.com

Phone: 919-789-9056

General Comment

I do not want rules loosened on gun exports which will increase the risk of dangerous weapons being bought or stolen by international criminals. The proposed rule changes do not adequately address our national security, foreign policy, and the need for transparency so Congress and the public can understand the impact of these rules on firearm exports.

The administration should consider other alternatives given the dangerous elements considered in these rules.

The rules changes would remove the licensing requirements for brokers, increasing the high risk of trafficking, and it would remove the State dept. blocking on the 3D printing of firearms. Removing this block enables 3D printing of firearms in the US and around the world.

American citizens want stronger regulations on firearms in the US and in trade. Americans do not want more terrorism in the world. Do not weaken the regulations, strengthen them.

PUBLIC SUBMISSION

As of: 7/13/18 8:21 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946j-jytn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0493

Public comment 943. Individual. Hazel Ryon. 7-9-18

Submitter Information

Name: Hazel Ryon

General Comment

My name is Hazel Ryon. I oppose the transfer of oversight of firearms export from the state to commerce department. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

Please let us know if you did this and how long it took. It should take one minute or less.

Thank you!

PUBLIC SUBMISSION

As of: 7/13/18 8:19 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946k-85pk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0492

Public comment 944. Individual. Theodore J. Fetter. 7-9-18

Submitter Information

Name: Theodore J. Fetter

Address:

187 Darrah Lane
Lawrenceville, NJ, 08648

Email: fetter4@verizon.net

General Comment

There is no question that there is a legitimate need to keep the State Department involved in decisions about the export of firearms. To what countries? In what quantities? The Department of Commerce, of course, might care about those questions, but generally they would be pleased to see a growth in US exports, and they would be far less likely to consider any vital questions to our national security interest.

I am told that there are traffickers in firearms whose business is to move weapons and ammunition from one place to another. They care about profit, not any country's security. I cannot imagine my government giving carte blanche to such movement of weapons and ammunition.

The Commerce Department has little staff and no training in this area. On the other hand, the staff at the State Department are trained to ask the right questions about what a particular export means for US foreign policy and for US relations with other countries.

PUBLIC SUBMISSION

As of: 7/13/18 8:14 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946k-wywr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0491

Public comment 945. Individual. Amy Armistead. 7-9-18

Submitter Information

Name: Amy Armistead

Address:

7206 Hawthorn Avenue

Los Angeles, CA, 90046

Email: amy@nancylangdon.net

General Comment

It defies logic, precedent and proven security safeguards. There is no reason to take away the power of the Department of State to regulate and control the sale and distribution of firearms from the US to other countries. The only interests the transfer of this regulatory obligation to the Department of Commerce would serve is that of gun manufacturers and distributors. This is a brazen power grab that does not serve the American people, their interests or their safety. The idea that any recommendation from this president* and his corrupt, self dealing cabinet should be considered, let alone adopted, defies logic and makes us more vulnerable than ever by sacrificing public safety for the enrichment of well connected companies and individuals who make their fortunes by pedaling violence and mayhem to already vulnerable and unstable parts of the world. This endangers us all. Do not allow this stupid, corrupt abuse of power to undermine our currently working regulatory framework.

PUBLIC SUBMISSION

As of: 7/13/18 8:12 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946k-59mj
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0490

Public comment 946. Individual. Alberta Wilkes. 7-9-18

Submitter Information

Name: Alberta Wilkes

Address:

213 Hanford St.
Columbus, OH, 43206

Email: awilkes2@yahoo.com

Phone: 614-444-1733

General Comment

I'm a Franciscan Sister volunteering for the past 30 years at my center city parish in Columbus OH. Our neighborhood is no stranger to drive-by shootings and robbery and other crime involving guns. Death and maiming from guns and assault rifles must be contained, and, ideally, stopped here and abroad.

I am opposed to the proposal to make it easier for our country to export firearms and assault weapons to other countries.

My understanding is that under what's proposed Congress would no longer have to review critical export deals, and that certain licensing costs will be borne by taxpayers. This is unthinkable! There is a raft of other measures that would loosen controls that are so needed on lethal weapons. If approved, the measures would result in more deaths in the world community. I believe that the oversight of gun export belongs to the State Department that is concerned with security and our Congress rather than the Commerce Department whose mission is mainly promoting trade.

Respectfully,

Sister Alberta Wilkes, OSF
St. Leo Convent
213 Hanford St.
Columbus OH 43206

Member of Pax Christi USA

PUBLIC SUBMISSION

As of: 7/13/18 8:10 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946k-yaza
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0489

Public comment 947. Individual. Suzanne Nordmann. 7-9-18

Submitter Information

Name: Suzanne Nordmann

General Comment

My name is Suzanne and I'm a voter in San Diego, CA. As a victim of gun violence, I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government i.e., taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators.

The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is

to promote trade.

PUBLIC SUBMISSION

As of: 7/13/18 8:08 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946k-9m3m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0488

Public comment 948. Individual. Margaret Hardy. 7-9-18

Submitter Information

Name: Margaret Hardy

General Comment

I am an active member of San Diego 4 Gun Violence Prevention and it has come to my attention that the Trump Administration is proposing to transfer licensing and oversight of firearms exports from the State Department to the Department of Commerce. It is my opinion that if this occurs, more firearms will get in the hands of criminal organizations, human rights abusers, and terrorist groups and is being pushed to open up international markets to compensate for lagging domestic gun sales. I am vehemently opposed to this proposed change for these reasons:

- Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- Eliminates Congressional oversight for important gun export deals.
- Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- Removes statutory license requirements for brokers, increasing risk of trafficking.
- Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- The Commerce Department does not have the resources to enforce export controls, even now.
- Reduces transparency and reporting on gun exports.
- Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
- Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

Please consider not implementing this proposal.

PUBLIC SUBMISSION

As of: 7/13/18 8:07 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946l-x4ih
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0487

Public comment 949. Individual. Dave Kisor. 7-9-18

Submitter Information

Name: Dave Kisor

General Comment

Background checks are necessary. The NRA fights them because people can't just go to a show and buy a gun without a check. It's high time the NRA's charter were challenged. I remember a time when they stood for gun safety, but now it's absolute nuttiness! Then there's the first half of the Second Amendment about the well regulated militia that everybody seems to have forgotten or ignore. Then there are those who want assault weapons, which are no good for defense, which strangely enough the reason for the Second Amendment was to defend the nation against enemies both foreign and domestic. One takes an assault weapon to _____, not to _____. If you did not guess assault and defend, then you should not have access to anything more dangerous than a soup spoon.

PUBLIC SUBMISSION

As of: 7/13/18 8:05 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946l-r79w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0486

Public comment 950. CTP Inc. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

Organization: CTP, Inc.

General Comment

BIS has noted in its proposed rule announcement that [t]he EAR does not include a concept of defense services, and the technology related controls are more narrowly focused and apply in limited contexts as compared to the ITAR. Consider that if ECCN 0E501 will control technology for the development, production, operation, installation, maintenance, repair, or overhaul of firearms controlled by new ECCN 0A501, then certain firearms training, which would have previously been an ITAR-controlled defense service, may now be NLR to many destinations.

BIS has also noted, If a gun manufacturer posts a firearms operation and maintenance manual on the Internet, making it publicly available to anyone interested in accessing it and without restrictions on further dissemination (i.e., unlimited distribution), the operation and maintenance information included in that published operation and maintenance manual would no longer be subject to the EAR. Following this logic, consider the fact that if a gun manufacturer posts on the internet for unlimited distribution 0E501 technology for the production of a 0A501 firearm (e.g., 3D printer specs), then it is not an unauthorized technology transfer but rather publicly available information no longer subject to the EAR.

PUBLIC SUBMISSION

As of: 7/13/18 8:03 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946l-vv2d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0485

Public comment 951. Individual. Mark Wilson. 7-9-18

Submitter Information

Name: Mark Wilson

General Comment

I oppose the rule change that would transfer firearms export regulations from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/13/18 8:01 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946l-1zkr Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0484

Public comment 952. Individual. Mary Klonowski. 7-9-18

Submitter Information

Name: Mary Klonowski

Address: United States,

Email: maryklon@comcast.net

General Comment

Please retain the export of firearms within the State Department. Their more rigid oversight will help ensure that U.S. made firearms aren't used against our own servicemen and women.

PUBLIC SUBMISSION

As of: 7/13/18 8:00 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-9461-td0g
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0483

Public comment 953. Individual. CM Schneider. 7-9-18

Submitter Information

Name: CM Schneider

General Comment

The Trump administration's changes to gun regulations and its alignment with the NRA and gun manufacturers is disgusting. I oppose the rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PUBLIC SUBMISSION

As of: 7/13/18 7:59 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946m-tpyg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0482

Public comment 954. Individual. Joann Edmonds-Rodgers. 7-9-18

Submitter Information

Name: Joann Edmonds-Rodgers

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would have devastating affects on our national security. If this rule change goes into effect we will soon find American guns being regularly used against American soldiers and in terrorist attacks abroad. There are many valid and good reasons the State Department has had control over firearm export regulation. Only they are in the unique position to understand who should and shouldn't be granted these licenses to ensure the safety of our military and the public. Please put our national security and lives above profits of the gun industry by opposing this rule change.

PUBLIC SUBMISSION

As of: 7/13/18 7:53 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946n-y3ce
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0481

Public comment 955. Individual. William Barclay. 7-9-18

Submitter Information

Name: William Barclay

Address:

304 Tulane Ave
Ventura, CA, 93003

General Comment

I oppose the rule change that would switch the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The proposed rule change would give control of the the export of guns and munitions over to the Dept of Commerce where the desire to increase exports and help US gun and munition manufacturers would over rule the questions of gun safety and the need to reduce, not increase the number of lethal weapons in the world at large. A bad decision.

PUBLIC SUBMISSION

As of: 7/13/18 7:52 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946n-gb42
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0480

Public comment 956. Individual. Barbara Karplus. 7-9-18

Submitter Information

Name: Barbara Karplus

General Comment

Please keep the control of firearms under the jurisdiction of the Department of State. We need to make sure our firerms do not end up in the hands of those who wish us harm. That is the purview of the State Department.

PUBLIC SUBMISSION

As of: 7/13/18 7:51 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946n-yio1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0479

Public comment 957. Individual. Becky Poole. 7-9-18

Submitter Information

Name: Becky Poole

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It seems that switching the regulatory bodies would switch the focus from humans' best interests to profit.

PUBLIC SUBMISSION

As of: 7/13/18 7:49 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946n-tap5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0478

Public comment 958. Individual. Jack Cook. 7-9-18

Submitter Information

Name: Jack Cook

Address:

46 Nexsen Road
Kingstree, SC, 29556

Email: jscookjr@icloud.com

Phone: 8433822209

Fax: 8433824881

General Comment

As the owner of a small gunsmithing operation in rural SC I urge the Commerce Department to assume control of small firearms and ammunition from the State Department. It is imperative to my business that we fix the horrible framework that is in place now. Effective 22 July 2016, gunsmiths suddenly found themselves subject to the regulatory authority of the Arms Export Control Act (AECA) as administered by the State Departments Directorate of Defense Trade Controls (DDTC). Regulators suddenly determined that traditionally routine gun repair and enhancement services now constitute firearms "manufacturing" and mandatory registration of my small, home-based business under International Traffic in Arms Regulations (ITAR). Tis ITAR directive advises gunsmiths to stop what they are doing and pay up or face fines and prison! (Violations under the ITAR can bring civil penalties of \$500,000 per violation and criminal penalties of up to \$1 million per violation along with up to 20 years in prison).

These rules are terribly confusing. I submitted some very direct questions to DDTC and have never received a reply. I developed a list of typical customer service requests that raise concern with respect to ITAR registration. Specifically, I requested their determination on these straightforward examples:

- 1) Drilling, threading and installing sling swivels on rifle forend (and buttstock) for sling and/or bipod (requires drill press and screw threading)
- 2) Fabricating replacement parts - such as firing pins for rifles and pistols (requires lathe turning, milling, grinding, and polishing)

- 3) Installation of Cominoli safety special option on Glock pistols (requires cutting of frame slot with Foredom tool and fixture)
- 4) Rifle barrel setback - to correct headspace and service misfire issues (requires lathe and chambering reamer)
- 5) Slide and frame milling and cuts adding cocking serrations for improved handling, chamfering and dehorning for concealed carry, and enhanced eye appeal (requires mill, surface grinder)
- 6) Installation of gunsmith fit barrel - for accuracy upgrade or to address headspace issues (requires milling and/or TIG welding of hood and foot to precise fit)
- 7) Installation of scope mount on early rifles - for hunting, competitive shooting, and sporterizing (requires drilling and tapping of mounting holes)
- 8) Re-crowning barrel - to improve or repair rifle accuracy (using lathe)
- 9) Installing 1911 Beavertail - to improve comfort and aim (requires precision cutting of frame, typically with mill)
- 10) Installing Sako-style extractor on Remington Model 700 rifle - primarily for improved reliability (requires milling and drilling of rifle bolt)

The above are, I think, a typical sampling of services that might reasonably be encountered in any gunsmith practice. I think that common sense will inform that this sort of everyday incidental activity for repair of firearms cannot constitute exportable manufacturing. Under State Department export control rulings all the above would likely constitute manufacturing and are illegal under ITAR absent payment of a large export fee. I urge you to assume administration at the Department of Commerce.

Obviously, the ITAR fee is a significant burden on a small gunsmith shop and will be an important factor in determining the viability and directions of my life endeavor. I am hopeful that the Commerce Department will take over administration and governance of small arms and ammunition manufacturing and repair.

PUBLIC SUBMISSION

As of: 7/13/18 7:48 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946n-4h2d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0477

Public comment 959. Individual. Sayre Weaver. 7-9-18

Submitter Information

Name: Sayre Weaver

Address:

372 Avenida Castilla Unit A

Laguna Woods, CA, 92637

Email: sayre.weaver@gmail.com

Phone: 213-924-8755

Fax: none

General Comment

I am a former Deputy District Attorney and a lawyer for more than 30 years who has spent much of her career representing survivors and victims of gun violence and local governments seeking to address gun violence in their jurisdictions through enactment of commonsense firearms laws. I am opposed to the proposed rule changes for all the reasons set forth in my comment submitted to the State Department. In summary, these proposed rule changes are contrary to the Congressional intent in enacting the statutes that govern arms exports, would reduce end-use controls for gun exports, increase the risk of small arms being trafficked by international human rights violators by eliminating registration of firearms exporters. By moving oversight to Commerce the proposed rule changes would effectively end State's successful and necessary Blue Lantern program, eliminate use of the State Department's database for tracking data related to illegal firearms trafficking abroad, and eliminate Congressional oversight for important firearms export deals. The end result of the proposed changes would be to further fuel armed conflict abroad by treating assault weapons as non-military weapons and moving to Commerce's control, a department whose primary mission is to increase trade, the very weapons research shows are the weapons of choice for gun traffickers, drug traffickers, and criminal organizations abroad.

PUBLIC SUBMISSION

As of: 7/13/18 7:46 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946o-ursu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0476

Public comment 960. Individual. Sally Jane Gellert. 7-9-18

Submitter Information

Name: Sally Jane Gellert

Address:

210 Broadway
Woodcliff Lake, NJ, 07677

Email: SJGUU@aol.com

General Comment

I am wary of the provisions of this change removing the need for a particular purchase order, and allowing entities to get blanket permits; these are weapons, and whether military or nonmilitary, are dangerous and need to be closely watched. I am wary of giving government officials exemptions from the same regulations that the rest of us follow; yes, they are almost certain to not be security risks, but they are all subject to the rule of law; they are not in some sense better than the rest of us. Having a government job should mean that one is subject to more scrutiny and regulation than others, not less; government workers are held to higher standards. Overall, seeing weapons as just another commercial product, which seems to be the direction that these changes take, though some regulation still remains, is a bad choice for a world striving for nonviolence. I oppose these changes.

PUBLIC SUBMISSION

As of: 7/13/18 7:45 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946o-63dx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0475

Public comment 961. Individual. Sally Jane Gellert. 7-9-18

Submitter Information

Name: Sally Jane Gellert

Address:

210 Broadway
Woodcliff Lake, NJ, 07677

Email: SJGUU@aol.com

General Comment

To add to my previous comment, another concern is that there will be no notification of large-scale arms sales, even to countries where turmoil is rife, where repressive regimes reign, or where lawlessness is great. Congress needs to stay on top of such transactions, even if the individual weapon is not traditionally a military-grade weapon. I think that there is value to having firearms under control of the Department of State. They are not simply another manufactured product; they are designed to maim and kill. They need special regulations, as currently enacted. It is not simply a question of military advantage, but of ensuring that the movement of deadly items is carefully monitored.

PUBLIC SUBMISSION

As of: 7/13/18 7:43 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946o-3ygn
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0474

Public comment 962. Individual. Nora Niedzielski-Eichner. 7-9-18

Submitter Information

Name: Nora Niedzielski-Eichner

General Comment

I strongly oppose any transfer of oversight of the export of weapons from the State Department to the Commerce Department. Doing so will endanger American security and the security of people around the world.

PUBLIC SUBMISSION

As of: 7/13/18 7:42 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946o-ptru
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0473

Public comment 963. Individual. Annette Martinez. 7-9-18

Submitter Information

Name: Annette Martinez

General Comment

Transferring the regulation of exporting firearms to the Commerce Depart makes the sale of firearms about money rather than safety. History has shown time and again that US exported firearms will be used against US citizens here and abroad.

Here are some of the many reasons rational people are opposed to this change:

- *Transfers the cost of processing licenses from gun manufacturers to taxpayers.
- *Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.
- *Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.
- *Eliminates Congressional oversight for important gun export deals.
- *Removes statutory license requirements for brokers, increasing risk of trafficking.
- *Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
- *The Commerce Department does not have the resources to enforce export controls.
- *Reduces transparency and reporting on gun exports.
- *Transfers gun export licensing from an agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

The State Department is the appropriate agency to regulate the exporting of firearms. The Commerce Depart is not.

PUBLIC SUBMISSION

As of: 7/13/18 7:35 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946o-ygxy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0472

Public comment 964. Individual. Hannah Friedman. 7-9-18

Submitter Information

Name: Hannah Friedman

General Comment

I am against the proposed rule change to make it easier for U.S. gun manufacturers and dealers to export guns and ammunition globally. This rule would basically be helping to arm those who want to do Americans harm; exported guns and ammunition will almost certainly fall into the hands of terrorist groups, criminal organizations, human rights abusers, and other dangerous groups. Given world events, how can we even consider shipping more arms abroad? The profit gains for American gun and ammunition manufacturers is simply not worth the risk.

PUBLIC SUBMISSION

As of: 7/13/18 7:34 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-o2qu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0471

Public comment 965. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Comments from an individual who works with USMLCategory I exporting every day:

Product migration will create a small cost-savings for my company in registration and licensing fees, but more significantly I do not see a demonstrated equivalent in terms of paperwork reduction or real time savings. Financial savings for smaller manufacturers will be proportionately larger and could increase the pool of available vendors with whom we work, which is a positive. I understand it has been problematic for small companies caught in the registration net due to their manufacturing activities, but whose size/finances cannot absorb the registration fee. This issue is better resolved by changing the definition of manufacturer to add a minimum size requirement..

The licensing process will still involve inter-agency review including staffing out to State Dept. Agencies and DOD. Other than utilizing a different application form and the change in the agency receiving applications, it has not been demonstrated exactly what, if any, process improvement this represents. Caveat: the devil you know is better than the one you don't.

Improvements and savings are quantified using the 43.8 minutes for BIS application vs. the 60 minutes for DDTC application. This metric provides no meaningful data from which to extrapolate total process savings or if any is really generated. It also in no way accounts for the additional significant burden which has been added to the exporting process by increasing the quantity and type of data capture elements which will be required for AES filing, including the need to record individual serial numbers for each firearm. Adding time-consuming elements later in the exporting chain significantly increases the time it takes to complete an export. These new control/requirements are more cumbersome than the current process under the ITAR. They will also increase the burden on an already overloaded CBP.

Recordkeeping changes discuss maintaining warranty certificates for international repair returns. My company does not issue customer specific warranty certificates, and I see this item as an additional record keeping burden which does not relate directly to exporting.

There will be burdens and expenses of transition: reclassification of all product, re-training of all employees, advanced training needed for Compliance personnel. I have not had to utilize SNAP-R previously, nor have I had

to deal extensively with Commerce-controlled exporting other than EAR99 product. There will be a substantial amount of time required to achieve comfort level with a new set of regulations. I understand this burden is considered short term, however the provided rationale for this migration has still not clearly demonstrated a substantial process improvement to warrant the expense and time of this transition.

The EAR does not include a concept of defense services and the technology controls are more narrowly focused and apply in limited contexts as compared to the ITAR. This change represents an improvement in terms of my ability to share information needed for marketing firearms and for repairing them internationally, but the same result could be achieved via amendment to the ITAR, factoring in that there have been few substantive changes to basic firearms technology in the past several decades and that most of this information is already available worldwide.

Maintenance of EAR status of previously classified product: The classification status of items that have been previously determined to be EAR99 product in formal CJ determinations is to remain EAR99 for these items. However, the scope mounts, swivels, accessory rails and iron sights enumerated in y.2 , y.3 and y.4 of 0A501 contradicts this statement and places them under .y control. I would appreciate clarifying language regarding EAR99 status and the removal of these items from .y control.

LVS shipments: the positive effect of the amendment made here by raising the value from the \$100 of 123.17(a) to \$500 is diminished by the change in language from wholesale value to the actual selling price. For relief to be genuine, the \$500 increase should be wholesale value and an additional increase to \$1000 for shipments to Canada, should also be considered. I do appreciate that receivers and breech mechanisms would be eligible for LVS if the destination is Canada.

I concur with the need for an appropriate 180 day delayed effective date for final rule. This amendment represents a major change in business operations and I will need time to completely identify all business operations requiring attention, create an implementation plan and draft appropriate changes in SOPs with accompanying training.

Finally, the rationale for this transition is based upon products being civilian use vs. military. Given that the debate regarding semi-automatic firearms has not been resolved in this country, we could incur transition expenses only to have the entire process reversed.

PUBLIC SUBMISSION

As of: 7/13/18 7:30 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-r4u5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0470

Public comment 966. Individual. Rachel Gatwood. 7-9-18

Submitter Information

Name: Rachel Gatwood

General Comment

I object to the proposed rule change. If the new rule took effect, then many types of firearms exports currently under the control of the U.S. Department of State (DOS) would instead be controlled the Commerce Department, which does not have the resources of the DOS. The Commerce Department could not easily prevent exported firearms from falling into the hands of oppressive regimes, criminals, or terrorists.

PUBLIC SUBMISSION

As of: 7/13/18 7:29 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-csvi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0469

Public comment 967. Individual. Sandra Wilder. 7-9-187

Submitter Information

Name: Sandra Wilder

Address:

15832 Norwich Cir

Westminster, CA, 92683

Email: swilder650@gmail.com

Phone: 7143766909

General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit the retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

This rule would transfer gun export licensing to an agency the Commerce Department whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[5] The export of these weapons should be subject to more controls, not less.

PUBLIC SUBMISSION

As of: 7/13/18 7:18 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-yvb6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0468

Public Comment 968. Individual. Christopher Grazioso. 7-9-18

Submitter Information

Name: Christopher Grazioso

Address:

50 Mountainview Road
Millburn, NJ, 07041

Email: grazioso415@yahoo.com

Phone: 973-376-4315

General Comment

I am opposed to this change. Please retain the current process and policy which provides for the necessary oversight to ensure all sales to foreign parties are appropriate and inline with American values.

PUBLIC SUBMISSION

As of: 7/13/18 6:54 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-c6ce
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0467

Public Comment 969. Individual. Deborah Goodell. 7-9-18

Submitter Information

Name: Deborah Goodell

Address:

Ridgewood, NJ, 07450-1617

Email: debgoodell@optonline.net

Phone: 2014472458

General Comment

I am opposed to changing the regulation of firearms exports from the State Department to the Commerce Department for several reasons. Firearms should continue to be classified as "military," and Congress should be allowed to block large sales to foreign countries. Otherwise huge caches of firearms could be sold to countries where human rights pose a grave issue, such as Egypt, Philippines, Turkey, and some Central American countries where the spread of weapons is likely to further destabilize the region and lead to more migration. Furthermore, it is my understanding that the Commerce Department does not have the resources to enforce the export controls that are needed to prevent these weapons from getting into the hands of organized crime or terrorists groups in foreign countries.

PUBLIC SUBMISSION

As of: 7/13/18 6:54 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-c6ce
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0467

Public Comment 969. Individual. Deborah Goodell. 7-9-18

Submitter Information

Name: Deborah Goodell

Address:

Ridgewood, NJ, 07450-1617

Email: debgoodell@optonline.net

Phone: 2014472458

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PUBLIC SUBMISSION

As of: 7/13/18 6:52 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-4zxm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0466

Public Comment 970. Individual. Barbara Hohlt. 7-9-18

Submitter Information

Name: Barbara Hohlt

General Comment

I am writing to oppose the proposed rule that would shift the responsibility of monitoring exports and import of firearms and ammunition from the State Department to the Department of Commerce. The shift would change a lot of current programs and make it far easier for weapons to be exported and divert to areas of conflict throughout the world. The State Department has a mission to reduce arms trafficking and promote peace and has successfully been doing this for years. The Commerce Department is by its name interested in increasing commerce. That is important but not in the area of providing more firearms, including semi-automatic weapons, to countries where they can be easily diverted into areas of conflict.

For instance, taking this monitoring out of the State Department would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. And It would remove licensing requirements for brokers, increasing the risk of trafficking.

It might also have an adverse effect on controlling the 3D printing of firearms. Why would we want to make it easier for gun traffickers and terrorist to get weapons. For the safety of our armed forces and our citizens we should keep the monitoring of exports/imports and of weapons brokers in the Department of State.

PUBLIC SUBMISSION

As of: 7/13/18 6:49 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946p-nu9p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0465

Public Comment 971. Individual. Frances Carroll. 7-9-18

Submitter Information

Name: Frances Carroll

Address:

16 Quimby Avenue
Hamilton, NJ, 08610

General Comment

I am opposed to loosening regulations related to the export of firearms. This is so dangerous, who could be for this, except those who are in the gun manufacturing industry and others who stand to make money from it? Given our national security concerns and in this age of international terrorism, loosening regulations on the export and sale of firearms is just about the worst thing we could do. This measure could potentially increase the chance of dangerous weapons ending up in the hands of international criminals. I do not think this proposal adequately addresses our interests with regards to national security, foreign policy, international crime and terrorist threats. The administration should NOT move forward with this reckless proposal.

PUBLIC SUBMISSION

As of: 7/13/18 6:46 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946q-493o Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0464

Public Comment 972. Individual. Michael Yantachka

Submitter Information

Name: Michael Yantachka

Address:

393 Natures Way
Charlotte, VT, 05445

Email: miyantach@hotmail.com

Phone: 8024253960

Fax: 05445

General Comment

Arms dealing is not just about commerce. Putting firearms sales under the Department of Commerce threatens the security of the United States. All firearms deals outside of the U.S. should have to go through the Department of State as they do now. For an administration that claims to have the security of the country at heart, giving free rein to arms manufacturers to sell to whomever they want will do just the opposite. Keep control of arms sales in the State Department.

PUBLIC SUBMISSION

As of: 7/13/18 6:45 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946q-o2xy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0463

Public Comment 973. Individual. Heidi Zollo. 7-9-18

Submitter Information

Name: Heidi Zollo

General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would allow firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

The State Departments Blue Lantern program would be eliminated, which has been in effect since 1940. The Blue Lantern programs carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. If Commerce were responsible for exporting of firearms, then public would likely not know any information about these firearms -- what firearms are going to which countries, regimes, etc. Licencing requirements would be removed for brokers increasing the risk of trafficking -- again what firearms to which countries/regimes.

Another issue is that 3D printing of firearms would be allowed, enabling 3D printing of firearms in the US and around the world.

If firearms regulations remain with the State Department, then Congress can oversee their sales, block sales of large batches of firearms to foreign countries. Congress would not be automatically informed about weapons sales, could not stop exports for national security concerns or to countries where there are serious human rights concerns.

The world would be a more dangerous place if Commerce were to have oversight of firearm exports.

PUBLIC SUBMISSION

As of: 7/13/18 6:43 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946q-7d70
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0462

Public Comment 974. Individual. Nancy Leon. 7-9-18

Submitter Information

Name: Nancy Leon

General Comment

Control of firearms needs to stay with the department of state for the safety of our country and the world.

PUBLIC SUBMISSION

As of: 7/13/18 6:41 AM Received: July 09, 2018 Status: Posted Posted: July 13, 2018 Tracking No. 1k2-946q-6jnw Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0461

Public Comment 975. Individual. Amy Thompson. 7-9-18

Submitter Information

Name: Amy Thompson

General Comment

I am against this proposed rule. It would make this country as well as the world more dangerous.

PUBLIC SUBMISSION

As of: 7/13/18 6:40 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946r-yzpr
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0460

Public Comment 976. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change would negatively impact US national security and should not be implemented. Thank you.

PUBLIC SUBMISSION

As of: 7/13/18 6:38 AM
Received: July 09, 2018
Status: Posted
Posted: July 13, 2018
Tracking No. 1k2-946r-jkc9
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0459

Public Comment 977. Individual. Sue Grele. 7-9-18

Submitter Information

Name: Sue Grele

General Comment

I strongly urge the Commerce Department to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. We cannot continue to ignore the fact that gun violence kills one thousand people around the world every day, and we should be making it harder, not easier, to export U.S. made weapons of war.

PUBLIC SUBMISSION

As of: 7/12/18 5:50 PM
Received: July 12, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9481-yoa8
Comments Due: July 09, 2018
Submission Type: Unknown

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0458

Public comment 978. Brownells. Robert McAllister. 7-9-18

Submitter Information

General Comment

See Attached

Attachments

Public comment 978. Brownells. Robert McAllister. 7-9-18



Proposed Rule 83 FR 24166 : RIN 0694–AF47

Regulatory Policy Division, Bureau of Industry and
Security, U.S. Department of Commerce,
Room 2099B, 14th Street and
Pennsylvania Avenue NW, Washington, DC 20230

Steven Clagett,
Office of Nonproliferation Controls and Treaty Compliance,
Nuclear and Missile Technology Controls Division
(202) 482–1641
steven.clagett@bis.doc.gov

It's fair to say Brownells, Inc. has utilized the fullest extent of the ITAR in our industry. We processed thousands of export licenses over the years, covering hundreds of manufacturers and thousands of products. We currently have a very broad WDA including categories I and III with a distribution territory covering nearly all of Europe.

Generally we applaud the changes proposed but have a few comments:

1. Our interpretation of the proposed change regarding firearms magazines is that .x includes magazines under 15 rounds. However, there appears to be no current difference in how .d and .x are controlled (regarding regions, LVS, etc.). State Department licensing policy regarding magazine capacity has often fluctuated within the bounds of the published regulation. Would it be more flexible to remove a regulatory category within the same ECCN that is based on a specific magazine capacity?
2. 0A502 is confusing at first glance (especially in considering the parts of shotguns) - why not incorporate a ".a", ".b", ".c", etc. for shotgun attributes like barrel length?
3. How are accessories of optics, like sunshades or other anti-glare devices to be treated? A simple note might save some time in creating CJs specific to this type of product.
4. Regarding 0B501 .e – What is the definition of "production" equipment? We have many hobbyist customers who wouldn't qualify as a gunsmith let alone as a manufacturer and tools

200 South Front Street • Montezuma, IA 50171-1000 USA
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www.brownells.com



and equipment designed for hobbyists are quite different than manufacturing equipment... Yet we have a concern these tools will be included in 0B501.e because even the hobbyist is "producing" a firearms part. If there could be some guidance for "production" equipment that clarifies the scope to manufacturing – perhaps "production" would be defined as repeated production of the same or similar parts in multiple quantities per day – this would help clarify the intent a great deal.

5. Serial number reporting for all firearms will cause an additional burden – especially as this is a duplication of effort for permanent exports FFLs will already recording this in the BATFE required A&D "bound book". Could this reporting be limited to TMP exports? Also, the reporting of Make/model/caliber information in AES will be burdensome considering the scope and variety of our daily shipments.
6. On potential issue is with the record keeping requirement of warranty certificates. An exporter may not have a manufacturer's (or any other) warranty certificate as part of the transaction. Perhaps some clarification is needed here that this is required only for the manufacturer when they export?
7. How is "technology" defined for 0E501/505? For example: shooting chronographs or empty brass cartridge annealing machines "technology"?

Best regards and thank you for your efforts,

Robert McAllister

A handwritten signature in blue ink, appearing to read "R. McAllister", is positioned below the typed name.

VP-Strategic Development
Brownells, Inc.

200 South Front Street • Montezuma, IA 50171-1000 USA
Main: 641.623.5401 • Fax: 641.623.3896 • Orders: 800.741.0015
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PUBLIC SUBMISSION

As of: 7/12/18 5:26 PM
Received: July 02, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9481-e44b
Comments Due: July 09, 2018
Submission Type: Unknown

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0457

Public Comment 979. Individual. Andrew Hill. 7-2-18

Submitter Information

General Comment

See Attached

Attachments

Public Comment 979. Individual. Andrew Hill. 7-2-18

Andrew W Hill
849 Hawks Bridge Road
Salem N.J. 08079

July 2, 2018

Regulatory Policy Division,
Bureau of Industry and Security,
U.S. Department of Commerce,
Room 2099B,
14th Street and Pennsylvania Avenue NW,
Washington, DC 20230.

Re: RIN 0694-AF47

In the matter of the proposed changes to how ITAR is implemented I would like to raise several points of concern.

First let me say that I welcome nearly all the changes as proposed. My professional background is in ammunition manufacturing. I have patented my own invention and am called upon to act in the capacity of an expert witness in legal matters. In addition to the 20+ years experience I have spent 12 years running the local 4-H Shooting Sports Program in my county. During that time youth from my club have competed in many local and national events. Many have medaled in big matches including one national champion in air rifle.

Concern #1.

The dollar value placed on exporting bullets (not loaded ammunition) seems impossible to actually kick in and out of skew with the rest of the proposed levels for other items. In many cases this would limit the buyer to only a single box of bullets. Many boxes of bullets, especially ones that are not made in but one or two countries are quite expensive. For example the following is the cost for a box of just 50 bullets.

.348 250 gr = \$43.50
.33 200 gr = \$41.00
38-55 255 gr = \$41.00
.408 350 gr = \$46.00
.404 350 gr = \$59.00
.425 400 gr = \$66.00
43 Spanish 400 gr = \$46.00
.475 #2 500 gr = \$106.50
50-110 450 gr = \$54.50
50-70 450 gr = \$54.00
.505 500 gr = \$72.00
.577 650 gr = \$83.50

Also many common caliber bullets made as a premium hunting bullet in a special weight are equally expensive per bullet.

30 cal 250 gr = \$45.50

32 Rem 170 gr = \$40.00 w/ minimum of 3 boxes

.358 300 gr = \$63.50 w/ minimum of 3 boxes

.416 400 gr = \$50.50

.458 500 gr = \$111.50

50 cal 500 gr = \$68.00

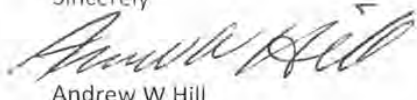
Based upon the other covered items in ITAR it would seem that the \$100.00 is just too low and should be \$300.00 minimum to allow someone with a small purchase of 200 – 300 bullets to reload for an older or odd hunting rifle. This is applicable to brass cartridge cases as well. And both are often purchased together. In all fairness ammunition components should be equal to the \$500.00 level assigned to gun parts.

Concern #2.

International competition in small bore rifle may be hurt with the 1,000 round limits on ammunition. Many matches require 100 or 200 shots for record. Usually the event has several days of competition. The match starts with sighters and if conditions are difficult (wind, lighting, and mirage) the rounds fired as sighters in a match can approach the number needed for record. Usually long distance travelers are given the day ahead to check everything and practice before the actual event. A junior shooter competed in Europe then visited the MEC shooting complex for one on one training before returning to the states. The days training was valuable and worth using double the amount of ammunition used in a two day competition. Certain unusual matches require many more record shots. The metric prone event is two days long and consists of 600 record shots. For these reasons I recommend making an exception for small bore 22 rimfire ammunition and allowing 2,000 rounds when traveling out of the country.

I am not aware of the requirements for shotgun competitions but think they are in a similar situation. Gold medalist Kim Rhode practices with 800 shots a day. Perhaps the exemption can be specified for competitors.

Sincerely



Andrew W Hill

PUBLIC SUBMISSION

As of: 7/12/18 12:39 PM
Received: July 03, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-942q-yy2q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0378

Public Comment 980. Deborah Cake. 7-3-18

Submitter Information

Name: Deborah Cake

Address:

60 Harvard St
Winchester, MA, 01890

General Comment

July 3, 2018

Comment on The Bureau of Industry and Security (BIS) Proposed Rule: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I couldnt be more astonished and dismayed that the gun lobby and industries are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

Firearms are rightfully categorized as military, and are under the regulation of the State Department. Congress should continue to be automatically informed about sizeable weapons sales and have the authority to stop them when that poses a risk to our national security or threatens to increase human rights violations by facilitating weapons sales to oppressive regimes.

No one anywhere should be allowed to make firearms on a 3- printer. Period!

Arms brokers should always be licensed, to try and prevent unlawful trafficking..

And by no means should the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, be dismantled.

The existing rules must be maintained and strengthened if switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

Do not weaken our fire arm protections by a transfer of authority from the State Department to the Commerce Department. Do not feed into the global oppressors and black market by deregulation.

Thank you for taking this letter, my opinion, seriously.

Deborah Cake

01890

Attachments

I oppose this BIS rule change that would switch the regulations of firearms export from the U

July 3, 2018

*Comment on International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, & III
The Bureau of Industry and Security (BIS) Proposed Rule: [Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List \(USML\)](#)*

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I couldn't be more astonished and dismayed that the gun lobby and industries are pushing for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).

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No one anywhere should be allowed to make firearms on a 3- printer. Period!
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And by no means should the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, be dismantled.

The existing rules must be maintained and strengthened if switching the regulation of firearms exports from the State Department to the Commerce Department facilitates firearms exports to oppressive regimes, removes safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuels violence that destabilizes countries and causes mass migration.

Do not weaken our fire arm protections by a transfer of authority from the State Department to the Commerce Department. Do not feed into the global oppressors and black market by deregulation.

Thank you for taking this letter, my opinion, seriously.

Deborah Cake

01890

PUBLIC SUBMISSION

As of: 7/12/18 12:24 PM
Received: July 04, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-9431-uzq7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0377

Public Comment 981. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

See attached file(s)

Attachments

I oppose this rule change that would switch the regulations of firearms export from the U

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Congress must not be prevented from being automatically informed about sizable weapons sales. Congress must be able to stop sizable weapons sales in the name of national security, even and especially to countries where there are serious human rights concerns, such as the Philippines and Turkey. Depriving Congress of this ability to monitor these sales is a terrible, dangerous idea. It would open the door to firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Allowing this country to do such an unconscionable thing is not only unamerican, it would directly contribute to making the world a more dangerous place as well as inviting security breaches here at home.

PUBLIC SUBMISSION

As of: 7/12/18 12:04 PM Received: July 05, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-943s-4hof Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0376

Public Comment 982. Individual. Barbara Shaw. 7-5-18

Submitter Information

Name: Barbara Shaw

Address:

20 Roberts Rd
Boxford, MA, 01921

Email: barbarashaw1@mindspring.com

Phone: barbarashaw1@mindspring.com

General Comment

See attached file(s)

Attachments

I oppose the rule change

I oppose the rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department which is focused on safeguarding our nation to the U.S. Commerce Department which is focused on promoting American business. With this rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Detailed concerns are that the rule change would eliminate the State Department's Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them; would remove licensing requirements for brokers, increasing the risk of trafficking; and would remove the State Department's block on the 3D printing of firearms. Promoting American business at the risk of further destabilizing the world is a bad deal.

PUBLIC SUBMISSION

As of: 7/12/18 11:53 AM
Received: July 06, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-944h-6hej
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0375

Public Comment 983. National Shooting Sports Foundation. Lawrence Keane. 7-6-18

Submitter Information

Name: Lawrence Keane

General Comment

See attached file(s)

Attachments

LGK Ltr - BIS - Proposed Rule Cats I-II-III 6 July 2018



NATIONAL SHOOTING SPORTS FOUNDATION, INC.

Headquarters: 11 Mile Hill Road, Newtown, CT 06470-2359

400 N. Capitol Street NW, Suite 490, Washington, D.C. 20001

202-220-1340 ext. 249 lkeane@nssf.org

Lawrence G. Keane

SVP Gov't & Public Affairs

Assistant Secretary & General Counsel

July 6, 2018

By Internet:

Federal eRulemaking Portal: www.regulations.gov - Docket BIS-2017-0004

By mail or delivery:

Steven Clagett
Office of Nonproliferation Controls and Treaty Compliance
Nuclear and Missile Technology Controls Division
Bureau of Industry and Security
U.S. Department of Commerce
14th Street and Pennsylvania Avenue, NW
Washington, DC 20230

RE: Comments on Proposed Rule – Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML) -- RIN 0694-AF47

Dear Mr. Clagett:

The National Shooting Sports Foundation (NSSF) respectfully submits the following comments to the above-referenced Federal Register Notice (83 FR 24166, May 24, 2018). NSSF is the trade association for America's firearm and ammunition industry.¹ Formed in 1961, NSSF membership includes more than 12,000 manufacturers, distributors, firearms retailers, shooting ranges, sportsmen's organizations, and publishers. We seek to promote, protect, and preserve hunting and the shooting sports, and we offer the following public comments.

Summary of High-Level Comments

The policy justifications for the proposed rule and the corresponding proposed rule by the State Department are described well on Commerce and State Department web pages at:

<https://www.bis.doc.gov/index.php/forms-documents/federal-register-notices-1/2220-cats-i-iii-myths-v-facts-posted-5-24-18/file> and <https://www.state.gov/t/pm/rls/fs/2018/282485.htm>

We encourage all those reviewing the proposed rules and the public comments to read these fact sheets to learn what the proposed regulatory rationalizations of U.S. controls on the export of

¹ For additional information on NSSF, please see www.nssf.org.

commercial firearms and related ammunition are and, as importantly, are not. So that the policy objectives behind the proposed changes, as well as the “myths” associated with them, are knowable to all those reviewing the proposed rules, we ask the Commerce Department to republish their essential content in the preamble to Commerce’s final rule. In this way, they will be part of the official record and help inform comments on final agency decisions made regarding the proposed rules.

As better described by these fact sheets and in the preambles to the proposed rules, commercial firearms and related items that are widely available in retail outlets that are now subject to the export control licensing jurisdiction of the State Department under the International Traffic in Arms Regulations (ITAR) on its U.S. Munitions List (USML) Categories I, II, and III would be transferred to the licensing jurisdiction of the Commerce Department’s Export Administration Regulations (EAR) in a series of new and coherently organized Export Control Classification Numbers (ECCNs). These proposed rules are the logical continuation of an effort began in 2010 under the Obama Administration to modernize the administration of U.S. export control regulations “to create a simpler, more robust system that eases industry compliance, improves enforceability, and better protect America’s most sensitive technologies.” We agree with the objectives of these bipartisan and widely supported changes. The proposed changes merely align the regulations with the nature of the items at issue, thus more efficiently accomplishing the national security and foreign policy objectives of the controls. Such changes reduce unnecessary burdens for both the U.S. Government and U.S. industry.

We have reviewed the proposed rule thoroughly with our membership. Except with respect to several of our comments set forth below, most members have told us that the final versions of the rules would eventually be beneficial because they would significantly reduce the overall burden and cost of complying with controls on the export of commercial firearms and ammunition. All who responded told us that there would be an initial short-term increase in burden and cost because of the need to re-classify thousands of commodity, software, and technology line items and SKUs affected by the new rules, but that the long-term regulatory burden reduction would significantly outweigh the short-term need to adjust internal compliance programs and practices. There would also be significant short-term costs and burdens associated with the need to become familiar with the nuances of the EAR and new BIS licensing officers. However, this burden, we believe, would be largely addressed by BIS’s long-standing commitment of industry outreach and training resources, which we appreciate.

Our members understand that there would be no change to the licensing policies for end item firearms and related ammunition. If a gun required a license to export when it was regulated by the State Department then it would require a license to export when it is regulated by the Commerce Department. If an export to a particular destination or end user would have been denied or approved before, it would be denied or approved in the same manner under the new rules. Applications would go through the same interagency review process, including by the Defense Department and also the State Department’s human rights and other experts. Under the new rules, no approvals would be converted to denials or denials to approvals.

Nonetheless, most of our members, particularly the small- and medium-sized companies, believe that the changes will be economically beneficial for them because the eventual regulatory

simplification and cost reductions will allow them to consider exporting when they might not have otherwise. Those that already export believe they will be able to expand sales of exports that would have otherwise been approved. They hold these views because BIS and the EAR are simply better able to regulate commercial items than are DDTC and the ITAR. This is not meant to be a slur of DDTC staff, which is excellent. It is merely a reflection of the fact that the ITAR exists to regulate the export of defense articles that provide a significant military or intelligence advantage in a “one size fits all” type approach with regulatory requirements that are more relevant to the export of a fighter aircraft than something that can be purchased at a retail outlet. The EAR exists to regulate dual-use, commercial, and less sensitive military items that warrant control, but in more tailored ways to fit the specific national security and foreign policy, including human rights, issues posed by the items.

These conclusions have been proven thousands of times through the application of similar export control reforms for other sensitive commercial or less sensitive military items that have been transferred to Commerce’s jurisdiction over the course of the last eight years. For example, under the Commerce system, there are no fees to apply for licenses. There are no redundant registration requirements for domestic manufacturers. There are no fees for registration. Such fees are bearable for large companies, but often not for small- and medium-sized companies. The license application forms are vastly simpler. Controls on less sensitive and widely available and basic parts, components, and technology are more tailored and allow for less burdensome trade with close allies through license exceptions. Sales with regular customers can be combined in to fewer license applications, thus reducing overall paperwork to achieve the same policy objectives. **There are many other benefits to the proposed changes as well described in the proposed rules’ preambles, but our essential conclusion is that, particularly with the changes recommended below, they will lead to growth for U.S. companies, more jobs in the United States, and related economic benefits for the cities and states where the members reside while accomplishing the same national security and foreign policy objectives they have always had.**

Notwithstanding our overall approval of the proposed rules, we have the following comments and suggested edits that would make the rules even more efficient and consistent with the overall objectives of the effort.

Specific Comments

I. ECCN 0A501 – Firearms (except 0A502 shotguns) and related commodities as follows (See List of Items controlled)

A. Subparagraph .e -- Define “Complete Breech Mechanism”

ECCN 0A501.e includes “complete breech mechanisms,” which is a term carried over from the current USML Category I(g). Neither State nor Commerce has defined this term and industry has struggled over the years with varying, informal definitions of the term. Are they individual bolts or bolt carriers? Are they assembled units of the bolt including all the other minor parts? Or are they firearm actions that include the receiver, all the breech and fire control parts, but without the barrel or stock?

RECOMMENDATION I.A.: To reduce regulatory burden and enhance compliance with the control, we request that BIS define the term in a manner consistent with industry standards, such as “complete breech mechanism, which is defined as an assembled unit consisting of the breech block, plug or bolt, including all parts and components necessary for operation of the mechanism.”

B. Subparagraphs y.2, y.3, and y.4 – Maintain EAR99 Status

We understand the objective of this and other .y subparagraphs created as part of the reform effort, which is to list in one place extraordinarily basic, widely available items that are nonetheless specially designed for controlled items and would otherwise get caught in and over-controlled by .x paragraphs. This is a rational approach and we are not objecting to it in general. However, another equally core and rational element of the reform effort is to not change the classification status of items that have been previously determined to be EAR99 items in formal determinations. ECCN 0A501.y contains the following three types of items we know to have been officially determined to be EAR99 for many years: (i) subparagraph y.2 - Scope mounts and accessory rails; (ii) subparagraph y.3 - Iron sights; and (iii) subparagraph y.4 - Sling swivels.

Converting these types of items to a .y control would thus be inconsistent with the reform effort in general, past practice, and several statements in the proposed rule’s Supplemental Information. For example, the proposed rule states that “for purposes of new ECCN 0A501 and the rest of the new ECCNs described [in the proposed rule], items previously determined to be “subject to the EAR” under a commodity jurisdiction determination issued by the U.S. Department of State **that were designated as EAR99 would generally not be classified in any of the new ECCNs that would be created with this proposed rule.** This would be consistent with Supplement No. 1 to Part 736, General Order No. 5, paragraph (e)(3) (Prior commodity jurisdiction determination) and the paragraph (b)(1) release from “specially designed.” (emphasis supplied). The Supplemental Information section goes on to state, with respect to General Order No. 5, that “items previously determined to be “subject to the EAR” and designated EAR99, would not be classified in a new ECCN being created to control items moved from the USML to the CCL, unless specifically enumerated by BIS in an amendment to the CCL. **“For example, most swivels and scope mounts for firearms have previously been determined through the CJ and classification process to not be ‘subject to the ITAR’ and designated as EAR99. The classification of such ‘parts’ would not be changed, provided the ‘part’ was not subsequently changed, which would require a separate jurisdiction and classification analysis.”** 83 FR at 24172.

The commodity jurisdiction and classification determinations of which our members are aware for mounts, rails, sights, and swivels over the years have concluded that they are EAR99 items, except in specific cases where the part replaces a component of the firearm and is no longer an independent attachment that can be easily removed, or is integrated into a component of the firearm. These conclusions were reflected in the following BIS answer on its FAQ website for firearms: “Q: What is the ECCN for mounts for optical sighting devices for firearms? A: Mounts, bases, rings and rails are EAR99.”

RECOMMENDATION I.B.: We request that the parts in subparagraphs .y.2, .y.3, and .y.4 be removed from ECCN 0A501 and that a Note be added to the ECCN confirming that they remain EAR99 items. The parts are extraordinarily low technology items and widely available throughout the world. If BIS nonetheless determines that controls are needed for certain types of mounts and rails, then we recommend changing the description for subparagraph .y.2 to “scope mounts and accessory rails that are integral to a firearm part or otherwise replace a firearm part necessary for the operation of the firearm.” This revision and split between EAR99 and .y paragraph will allow for the same controls DDTC placed on different types of individual parts.

C. Note 1 to 0A501 – Rationalize Controls Over Antique Firearms and Muzzle Loading Black Powder Firearms

The proposed note states that “Antique firearms (i.e. those manufactured before 1890) and reproductions thereof, muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design, BB guns, pellet rifles, paint ball and all other air rifles are EAR99 commodities.” We appreciate the note, but it would lead to increases in controls on several types of items.

1. Antique Firearms

The Note defines antique firearms as “those manufactured before 1890 and reproductions thereof.” Under the current ITAR controls, antique firearms are controlled under USML Category I(a), but a license exemption exists under 22 CFR § 123.17(b) that allows exports without a license of “firearms covered by Category I(a) . . . if they were manufactured in or **before 1898**, or replicas.” BIS’s proposed definitional change of antique firearm from the ITAR’s 1898 point to 1890 is significant because it will require BIS licensing of certain antique rifles now exempt from license requirements under the ITAR. For example, early Winchester rifle Models 1892, 1894, and similar would be controlled far more strictly than is the case now. There is a significant collector market worldwide for such antique American rifles. U.S. companies and others have used the ITAR exemption to satisfy that demand for years without any threats to American national security or foreign policy objectives.

In addition, both of these controls are more restrictive than the Wassenaar controls which are pre-1890 for antique handguns, but actually are pre-1938 for antique rifles. See <https://www.wassenaar.org/app/uploads/2018/01/WA-DOC-17-PUB-006-Public-Docs-Vol.II-2017-List-of-DU-Goods-and-Technologies-and-Munitions-List.pdf> (page 175 ML1.a, note A).

RECOMMENDATION I.C.1.: We request BIS to revise Note 1 so that the definition of antique firearms is aligned with the Wassenaar controls. If BIS is not willing to consider this change, we request BIS change the date threshold in the definition of antique firearm in Note 1 from 1890 to 1898 so that it is consistent with the ITAR’s exemption.

2. Muzzle Loading Black Powder Firearms

The proposed Note 1 states that “muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design.” This wording is a revision of what is

currently controlled under ECCN 0A018.c, which is “Muzzle loading (black powder) firearms with a caliber less than 20 mm that were manufactured later than 1937 and that are not reproductions of firearms manufactured earlier than 1890.” A note to current 0A018.c states that **“0A018.c does not control weapons used for hunting or sporting purposes that were not “specially designed” for military use** and are not of the fully automatic type, but see ECCN 0A984 concerning shotguns.” (emphasis supplied).

The Note clearly states that those firearms that are used for hunting and sporting purposes are not controlled under that entry. This policy has been in effect for decades with no apparent harm to national security or foreign policy objectives. In the proposed Note 1 to 0A501, however, the statement regarding control of weapons used for hunting and sporting purposes has been removed. The proposed rule also does not state why such a change is necessary. The change is more than a housekeeping edit because it will cause a number of muzzle loading rifles that are now EAR99 items to be controlled as regular firearms under 0A501.a. The new wording also adds confusion by saying muzzle loaders are EAR99 “except those designs based on centerfire weapons of a post 1937 design.” This would add controls to modern muzzle loading rifles that operate with bolt mechanisms but that look like regular centerfire rifles (e.g. Savage ML10), but have completely unique parts that are not compatible with a centerfire rifle that fires conventional cartridges.

RECOMMENDATION I.C.2.: We request BIS to revise Note 1 to delete the phrase “except those designs based on centerfire weapons of a post 1937 design.”

3. Combination Firearms

Neither ECCN 0A501 (firearms) nor ECCN 0A502 (shotguns) refer to firearms that are a combination of shotgun and rifle, i.e., that have two barrels. Such combination firearms normally include one rifled barrel which fires conventional cartridges and one smooth-bore barrel that fires shot shells. Some types of combo firearms may be based on shotgun actions, while others may be based on rifle actions.

RECOMMENDATION I.C.3.: We request that BIS state where on the CCL such combination firearms should be controlled.

II. **0A502 Shotguns; complete trigger mechanisms; magazines and magazine extension tubes; complete breech mechanisms; except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.**

A. Align Availability of License Exception LVS with 0A501

Unlike ECCN 0A501 (firearms), ECCN 0A502 does not include any list-based license exceptions. The export of, for example, a 0A501 trigger or magazine would be eligible for License Exception LVS but the export of a 0A502 trigger or magazine would not. Thus, the entry, as proposed, would control more strictly without any obvious policy benefit the basic low-value parts and components in 0A502 that would be eligible for LVS exports under 0A501.

RECOMMENDATION II.A.: In order to have consistent controls and exceptions for similar items, we request that BIS allow the use of License Exception LVS for 0A502 parts and components to the same extent proposed for 0A501 for the same types of items, such as shotgun trigger mechanisms, magazines, and magazine extensions. This could be done with the following edits to the proposed rule:

- i. Change the ECCN heading to “Shotguns and related commodities as follows (See List of Items controlled), except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.”
- ii. Include in the List of Items Controlled new subparagraphs to separately list breech mechanisms, and the remaining components (e.g., “including complete trigger mechanisms; magazines and magazine extension tubes”) with a corresponding Reason for Control which allows for use of exception LVS to the same extent as proposed for 0A501.

B. Define “Complete Breech Mechanism”

The ECCN 0A502 heading includes the term “complete breech mechanisms” as part of the control. As discussed above, the U.S. government has not defined the term and there is significant industry confusion regarding its meaning.

RECOMMENDATION II.B.: We request that BIS define the term in a manner identical to a definition that would be applicable to 0A501.

C. Resolve Inconsistency Regarding Use of Term “Combat Shotgun”

The “Related Controls” part of ECCN 0A502 states that “This entry does not control combat shotguns and fully automatic shotguns. Those shotguns are ‘subject to the ITAR.’” State’s proposed rule, however, would remove references to “combat shotguns” and use the phrase “Fully automatic shotguns regardless of gauge” instead.

RECOMMENDATION II.C.: We request that the reference in 0A502’s “Related Controls” note be made consistent with how such shotguns are referred to in the revised USML Category I.

III. 0A504 Optical sighting devices for firearms (including shotguns controlled by 0A502); and “components” as follows (see List of Items Controlled)

A. Make License Exception LVS Available for 0A504.g Items

Unlike parts and components for many 0A501 items, the proposed 0A504.g (“Lenses, other optical elements and adjustment mechanisms”) does not allow for the use of License Exception LVS.

RECOMMENDATION III.A.: To align the availability of the exception for similarly significant items on 0A501, we ask that License Exception LVS be available for 0A504.g components, which are insignificant relative to the other items in 0A501. Given the sensitivity of the other optical items in 0A504, we are not requesting such a change for other items in the entry.

B. Note 1 to 0A504.f

The proposed Note 1 to 0A504.f states that “0A504.f does not control laser boresighting devices that must be placed in the bore or chamber to provide a reference for aligning the firearms sights.” There are, however, a variety of bore sighting devices that are placed over the muzzle of the barrel instead of inside the bore or chamber. Such devices perform the same function as those described in the proposed note.

RECOMMENDATION III.B.: We request that this Note be revised to read as follows: “0A504.f does not control laser boresighting devices that provide a reference for aligning the firearms sights. This includes any laser boresighting device, regardless of how it attaches to the firearm (e.g. boresights that fit over the muzzle of the barrel), which performs the same function.”

IV. 0A505 Ammunition as follows (see List of Items Controlled)

A. Remove 0A018 and Transfer Controls to 0A505

One of the organizational changes inherent in the reform effort is the movement of military items once controlled in -018 entries into new 600 or 500 series entries. With this change, similar items are clumped together in the same places on the CCL. If an exporter wants to identify the military items on the CCL, it would look to the 600 series entries. The proposed rule follows a similar approach by combining all the various commercial firearm, ammunition, and related items in a new set of 500 series ECCNS. Such changes increase compliance by reducing the risk of an exporter missing a control in a stray ECCN.

RECOMMENDATION IV.A.: We request that all commercial firearm, ammunition, and related items be in one of the series of new 500 series ECCNs and not left behind in legacy -018 entries. Once the items to be controlled in the proposed 0A018.b are moved to 0A505, and controlled in the same manner, then 0A018 could be removed because all its other subparagraphs have already been consolidated with other new ECCNs.

B. Resolve Inconsistencies between Proposed 0A018.b and 0A505

The items described in proposed 0A018.b have been revised and rewritten into the proposed changes to USML Category III and the new ECCN 0A505. Leaving ECCN 0A018.b unchanged would cause confusion and potential compliance mistakes due to the overlap of controlled items as listed in new ECCN 0A505. For example, 0A505.d states that AT-only and UN controls apply to blank ammunition but does not refer to the note in 0A018.b that excludes dummy ammunition for control.

RECOMMENDATION IV.B.: When consolidating the controls of 0A018.b into 0A505, redundancies and inconsistencies should be removed. For example, 0A018.b's control over specially designed components should become part of the standard .x specially designed catch-all provision that is in 0A505. We also request that the de-control note in 0A018.b be transferred to 0A505 so that the current EAR99 status of such items is maintained. If there are policy reasons to remove dummy ammunition from its EAR99 status, we ask that the reasons for control provisions applicable to dummy ammunition in 0A505.d be limited to existing UN and AT-only controls for blank ammunition.

C. Allow for Use of License Exception LVS

Proposed ECCN 0A505 includes an allowance for license exception LVS of \$100 for subparagraph .x "parts" and "components." As discussed, the proposed 0A501 would have an LVS allowance of \$500 for firearm parts and components. This difference will cause additional licensing burden, especially for small and mid-sized ammunition exporters. Ammunition components have seen major increases in cost over the last 10 years. In addition, the higher cost big bore and precision loads are becoming more popular with foreign buyers. This will make the \$100 LVS allowance too low to be relevant to BIS's objectives in proposing it. For example, Norma .470 Nitro Express empty brass is priced at approximately \$4 per unit, or \$100 per box of 25. Under the proposed LVS limit of \$100, only one small box could be exported under the exception. For two boxes, a license would be required.

RECOMMENDATION IV.C.: We request BIS to raise the value limit for the LVS exception to \$500 to match that allowed for firearm components. We believe this is reasonable since the controls in place now under ECCN 0A018.b have an LVS allowance of \$3000 for "specially designed" components and parts for ammunition, and this allowance is much higher than the \$500 we are requesting.

RELATED RECOMMENDATION IV.C.2.: As this example indicates, inflation can alter the policy judgments made with respect to the first allowance for the use of License Exception LVS for items. Thus, we ask BIS to consider pegging and periodically revising License Exception LVS amounts to roughly scale with inflation over time for the items at issue.

V. 740.9 Temporary imports, exports, reexports, and transfers (in-country) (TMP)

A. Allow for Use of License Exception TMP to Transfer Items to Affiliates

Revised paragraph 740.9(a) restricts use of License Exception TMP for firearms under 0A501.a and .b, and shotguns with barrel length less than 18" under 0A502. It states: "The only provisions of this paragraph (a) that are eligible for use to export such items are paragraph (a)(5) of this section ("Exhibition and demonstration") and paragraph (a)(6) of this section ("Inspection, test, calibration, and repair")." The revision thus excludes the possible use of paragraph (a)(10) for temporary exports to a U.S. Person's foreign subsidiary, affiliate, or facility abroad if for manufacturing, assembling, testing, producing, or modifying the item. There are a number of US firearm and ammunition manufacturers with foreign parent companies or that have foreign subsidiaries or facilities that would use TMP for the purposes set out in paragraph

(a)(1). Many of these companies use DDTC DSP-73 Temporary Export Licenses in order to send commodities back and forth with their foreign parent or subsidiary particularly since many new products are jointly engineered and require input from both parties. Prohibiting the use of paragraph (a)(10) for transactions between affiliates will cause an unnecessary burden to these companies and one in excess of current burdens under State's existing licensing practices for affiliate transactions.

RECOMMENDATION V.A.: We request BIS to allow for the use of License Exception TMP paragraph (a)(10) for firearms controlled under 0A501.a and .b, and shotguns with barrel length less than 18" under 0A502. DDTC granted similar authorizations without issue for such items. This change would essentially maintain the status quo with DDTC's long-standing practice. Requiring exporters to get licenses from BIS to permanently export items to its affiliates for such joint efforts that are intended to result in products to be returned to the United States would not be efficient.

B. Adjust the TMP Limitation to 100 Firearms per Shipment from 75 per Shipment

Revised TMP paragraph (a)(5) states that "paragraph (a) may not be used to export more than 75 firearms per shipment." This number does not take into account the variety and volume of products that major companies normally export for trade shows. For example, it is not unusual for nearly 100 variations of a company's product line to be sent to the IWA Show in Germany each year.

RECOMMENDATION V.B.: We ask BIS to increase the number of items allowed for temporary export under paragraph (a)(5) to 100 per shipment to more closely align with commercial expectations and practices. This change will not reduce government visibility into what is exported because revised paragraph (a) would require that "the exporter or its agent must provide documentation that includes the serial number, make, model, and caliber of each firearm being exported by filing these data elements in an EEI filing in AES."

C. Provide Guidance Regarding the Import of Goods Temporarily Exported

The proposed rule would add the following sentence to section 740.9(b): "No provision of paragraph (b), other than (b)(3), (b)(4), or (b)(5) of this section, may be used to export firearms controlled by ECCN 0A501.a, .b or shotguns with a barrel length less than 18 inches controlled in ECCN 0A502." This would prohibit the use of License Exception TMP paragraphs (b)(1) (exports of items temporarily in the United States) and (b)(2) (items imported for marketing or display at U.S. exhibitions or trade fairs) for exports of firearms and shotguns with less than 18" barrels.

Paragraph (b)(2) relates to temporary imports for exhibition or marketing. New paragraph (b)(5) essentially replaces (b)(2) insofar as it concerns firearms and certain shotguns. New paragraph (b)(5) details the process for temporary import and subsequent export of these items. The proposed process in this regard is fair and reasonable. It is common practice to cite the regulatory exception for the temporarily imported commodities at the time of import, then

reference the import documents at time of return export of the goods. We believe the process as described will not cause any additional burden to exporters.

RECOMMENDATION V.C.: BIS has provided a clear process for temporary imports under the new paragraph (b)(5). However, the regulations are not clear about the process regarding imports of goods temporarily exported under TMP. We recommend BIS provide similar guidance for temporary exports which explains the process for return importation of the commodities.

D. Allow TMP paragraph (b)(1) to be Used

Paragraph (b)(1) authorizes the temporary import and subsequent export of “Items moving in transit through the United States.” The proposed new sentence in paragraph (b) does not allow this paragraph to be used for firearms controlled by ECCN 0A501.a, .b or shotguns with a barrel length less than 18 inches controlled in ECCN 0A502. Currently, these types of transactions are authorized by DDTC on a DSP-61 Temporary Import License. Requiring a BIS export authorization for items moving in-transit through the US to a third country seems unnecessarily burdensome.

RECOMMENDATION V.D.: We ask BIS amend the new sentence in paragraph (b) and allow use of paragraph (b)(1) for firearms controlled by ECCN 0A501.a, .b or shotguns with a barrel length less than 18 inches controlled in ECCN 0A502.

VI. 740.14 Baggage (BAG)

The purpose of this license exception is to allow individuals to travel overseas with personal baggage, and to make allowances for certain types of controlled commodities. The proposed rule adds a new paragraph (e) “Special provisions for firearms and ammunition.” The revisions regarding use of license exception BAG include requirements for filing data in the Automated Export System (AES), which is extremely problematic for individuals.

The proposed rule states that “BIS is proposing to modify § 758.1 of the EAR to make clear that **exporters would continue to be required to file** Electronic Export Enforcement (EEI) to the **Automated Export System (AES) for transactions involving such firearms and associated ammunition that are otherwise authorized pursuant to License Exception BAG.**” BIS, however, acknowledges the problems related to the requirement for individuals to file data in the AES system when it states that “BIS is aware that U.S. Customs and Border Protection (CBP) has temporarily suspended the requirement to file EEI to the AES for personally-owned firearms and ammunition that are ‘subject to the ITAR’ being exported under 22 CFR 123.17(c), due to operational challenges related to implementation.” BIS goes on to state that “Whether and how BIS includes this requirement in a final rule would be **based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published.** If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP’s existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests

an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition.”

In 2011, DDTC published a Federal Register notice of proposed rulemaking (76 FR 16353, March 23, 2011) titled “Exemption for the Temporary Export of Chemical Agent Protective Gear” principally revising the exemption related to personal protective equipment, but also including a revision to the firearm exemption as follows: “an exemption for firearms and ammunition is clarified by removing certain extraneous language that does not change the meaning of the exemption.” In fact, the proposed change was much more significant and new wording to be included in the exemption was as follows: “The person . . . presents the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System per §123.22 of this subchapter. . . .” Neither the title nor the summary of the notice mentioned the substantive modification to the procedures regarding the exportation of firearms and ammunition. The only reference to the change to export requirements was a reference to the removal of “extraneous language.” The notice actually confused the public by stating in the summary that the meaning of the regulations had not changed. As a result, the public was not informed that changes to the exportation process had been proposed and that they should or could provide comments on these possible changes. The rule was published as final on May 2, 2012 (77 FR 25867).

In 2014, DDTC and CBP began enforcing the change, and it caused a major upheaval for individuals travelling overseas with firearms. As BIS noted in the proposed rule, CBP temporarily suspended the requirement for AES filing due to the implementation issues.

There are several reasons why AES is the wrong system for individuals to use:

1. The system is meant for commercial exports. There are a number of required data fields that are not applicable to exports by individuals carrying personal property.
2. The AES system requires an Employer ID Number (EIN) before a user can submit any data. It does not allow individuals to access the system with a Social Security Number. In fact, the allowance for a SSN was removed by Census in 2010 due to privacy concerns.
3. There is conflicting information on the Census website and the IRS website regarding an individual obtaining an EIN. While both agencies have guidance indicating that individuals may obtain an EIN for purposes of filing in AES, **there is no written policy or regulation to support this.** In fact, when the individual requests an EIN, they must make several assertions in the form that the purpose is for establishing a business concern. They are required to sign the form under penalty of perjury, declaring that all the information is true and correct, when in fact the individual is not establishing a business.
4. There are multiple fields in AES related to commercial exports, including port of export, type of export, license codes, and Harmonized Tariff System (HTS)/Schedule B commodity codes. Individuals generally have no knowledge

of this information and at best can only take guesses at the correct data to input. For example, the port of Los Angeles has five different codes. Which one is correct for that person's travel? For commodity codes, how is an individual supposed to understand the complexity of the numbers and pick the correct one? All this information is a common and ordinary part of commercial exports, but not for personal carries.

5. The AES system is implemented under the Foreign Trade Regulations (FTR) which carries authority for penalties for inaccurate information entered into AES, up to \$10,000. Individuals trying to use the AES system are at extremely high risk for penalty because they lack the knowledge to ensure the data is accurately entered in the electronic system. And, as described above, the system is not designed for use by individuals with personal baggage. Therefore, the risk of inadvertent violations is extremely high even with the best compliance intentions.

The BAG exception as revised would thus impose unduly burdensome requirements and compliance traps on hunters, competitive shooters, and other U.S. residents who wish to take firearms out of the country on a temporary basis for lawful purposes. According to American Hunter magazine, there are likely more than 100,000 American hunters who travel abroad every year with their firearms. Typical hunting trips can cost \$10,000 to \$25,000, or more.

Finally, the AES requirement applies only to new paragraph (e)(3) "Special provisions for firearms and ammunition." Current BAG paragraphs (e)(1) and (e)(2) regarding "Shotguns and Shotgun Shells" are not changed, and do not include a requirement for AES filing of export data. BIS has never required AES filing for temporary exports of shotguns under BAG. Until 2012, DDTC had never previously required AES filing for temporary exports of firearms.

RECOMMENDATION VI: As we proposed to DDTC and CBP in 2014, we recommend an alternate to the AES system as follows:

1. Rather than trying to force the AES system to fit the purposes of this data collection, we recommend that CBP develop a simple online interface that uses the individual's passport number as the reference number. Every person leaving or entering the US must present a passport to CBP, and CBP has an electronic system to review the individual's passport data.
2. Under the current process, individuals travelling overseas with firearms are completing the CBP Form 4457 "Certificate of Registration for Personal Effects Taken Abroad" to register their firearm for export and reentry. This form includes details regarding the property being carried as baggage, including details of the firearm (model, caliber, serial number). There have been indications that CBP is planning to implement an electronic version of this paper form. An electronic Form 4457 could be linked to the passport review system. This would allow CBP officers to see not only the individual's passport information, but also any personal property including firearms being taken out of the U.S. and for review upon re-entry to the U.S.

VII. 743.4 Conventional Arms Reporting

This section details the U.S. obligations for special reporting requirements for exports of certain items listed on the Wassenaar Arrangement Munitions List and the UN Register of Conventional Arms. Participating States of the Wassenaar Arrangement exchange information every six months on deliveries to non-participating states of conventional arms set forth in the Wassenaar Arrangement's Basic Documents. Similar, although not identical, information is also reported by the U.S. Government to the United Nations on an annual basis.

The proposed rule would “revise paragraph (c)(1)(i) and (c)(2)(i) to add ECCN **0A501.a and .b (firearms) as commodities that would require Wassenaar Arrangement reporting and United Nations reporting** under this conventional arms reporting section of the EAR . . . the reporting requirements under § 743.4(c)(1)(i) and (c)(2)(i) would be limited to exports authorized License Exceptions TMP, GOV and RPL.”

The EAR does not now require exporters of any other type of item to make any such reports to the Wassenaar Arrangement. The proposed change would thus unfairly focus additional regulatory burdens that do not now exist on the ITAR or the EAR for exporters of firearms. We do not see any policy benefits for this new obligation, particularly since the US government already would have such information and could continue making such reports as it usually does. For example, under the proposed changes to Part 758 “Export clearance requirements,” new paragraph 758.1(b)(10) requires electronic export information (“EEI”) to be filed for all exports of 0A501 .a or .b firearms in the AES system. This will include exports under exceptions such as TMP, GOV, and RPL. AES records data for every export shipment in real time and would be an instantaneous and reliable method for the U.S. Government (not individual exporters) to gather and sort such information. BIS has reporting responsibility for all exports which the agency approves by export license and therefore already has a process for reporting the required information. We believe that BIS receives daily updates of AES data which includes exports both by license and license exception, and therefore already has the information necessary to comply with the Wassenaar and UN reporting requirements as related to exports under exceptions.

Moreover, we do not believe that any of the Paperwork Reduction Act requirements have been completed for this proposed new collection and reporting obligation. We do not, for example, believe there is a sufficient description of the plan for how the data would be used or that the proposed method has been properly tested to ensure that there is no net increase in regulatory burdens. Or, if there is to be an increase in regulatory burden associated with this new requirement, it is impossible to see how the U.S. government could have come up with an accurate estimate of the new burden based on what is described in the proposed rule. Under Supplement No. 1 to Part 730, it appears that information requests related to Part 743 are included under OMB Collection Number 0694-0137 (License Exceptions and Exclusions). The proposed rule analyzed that collection number with respect to License Exception STA, but the rule did not address the impact of adding the first items to be required to be reported under section 743.4. Moreover, as described, the U.S. government is in a far better position to provide

the requested information that it would already have in its files to the international organization than would be U.S. companies.

RECOMMENDATION VII: We request that BIS delete this new reporting requirement that would impose an unnecessary burden on individual exporters. BIS could far more easily satisfy its obligations to the Wassenaar Arrangement by collecting, sorting, and presenting this information from data it receives from the AES. If BIS nonetheless wants to consider imposing such a novel burden on exporters, we ask that it publish a separate proposed rule on the topic in a manner consistent with the requirements of the Paperwork Reduction Act.

VIII. Part 758 Export Clearance Requirements

A. Delete Proposed AES Reporting Requirements

New paragraph 758.1(g)(4) (“Exports of Firearms and Related Items”) states that “For any export of items controlled under ECCNs 0A501.a or .b, or shotguns with a barrel length less than 18 inches controlled under ECCN 0A502, in addition to any other required data for the associated EEI filing, **you must report the manufacturer, model number, caliber and serial number of the exported items.**” The explanation for the change states this is “to expand the data elements required as part of an AES filing.”

We do not agree with the statement in the proposed rule on page 24180 that such additional requirements would not impose additional new paperwork burdens on exporters. Moreover, we do not believe that this new requirement is compliant with the Paperwork Reduction Act. We do not, for example, believe there is a sufficient description of the plan for how the data would be used or that the proposed method has been properly tested to ensure that there is no net increase in regulatory burdens. Or, if there is to be an increase in regulatory burden associated with this new requirement, it is impossible to see how the U.S. government could have come up with an accurate estimate of the new burden based on what is described in the proposed rule.

We understand that the proposed rule states that the new burden would “ensure law enforcement officials are able to effectively verify that firearms exports are properly authorized and in conformance with all applicable regulations.” We disagree, however, that CBP needs the additional data to verify if the export has been authorized by BIS, either by export license or license exception. CBP’s role is to verify that the shipment consists of commodities approved for export according to the license or exception, not by serial number. Moreover, we question why this data is being required for every export of firearms, and what will be done with the serial number data. In particular, our industry has concerns that aggregating serial number information in this manner could be the start of a firearm registry. None of these issues was apparently addressed in BIS’s or OMB’s PRA analysis. There are many other infirmities with the PRA analysis or the general justification for the new paperwork burden:

1. CBP has a targeted risk assessment program for identifying export shipments which warrant physical inspection. When firearm shipments are thus selected, the exporter provides the CBP officer with copies of the export documents, including packing lists with serials numbers. This is a reasonable basis for review of serial

numbers, and industry does not dispute it. However, CBP does not inspect every firearm export shipment and therefore the rationale to require such records for each shipment is unsupported.

2. Law enforcement agencies, both in the US and abroad, already have an established process with ATF to trace firearms used in crimes. The ATF Tracing Center provides assistance to all international police agencies to assist with their endeavors. Thus, we cannot see why law enforcement would need serial number records of every export shipment of firearms, at the time of export, when the majority of these shipments are never subject to review for illegal activity.
3. This requirement is only applied to firearms controlled under ECCNs 0A501.a or .b, or shotguns with a barrel length less than 18 inches controlled under ECCN 0A502. It does not apply to any other shotguns controlled under ECCN 0A502 which have been under BIS control for decades. Thus, the control is inconsistent with past practice.
4. The serial number requirement is not included in the proposed changes to the ITAR for Categories I, II and III, and therefore is not required for military items such as fully automatic firearms.
5. The AES system does not have the capability to input all the required data. New fields would be needed for each data element. In particular, the volume of firearms exported in a particular shipment can be anywhere from 10 to 1000 units. Requiring this data to be input into an electronic system would be a huge burden and would require companies to spend a massive amount of time and money to establish processes within their IT enterprise systems to input such massive amounts of data.

RECOMMENDATION VIII.A.: We strongly request that BIS delete the new requirement for reporting the manufacturer, model number, caliber and serial number of the exported items in the AES system.

B. Delete Proposed Restrictions in Sections 758.1(c)(1) and 758.10(b)(2)

The proposed change to 758.1(c)(1) would prohibit the use of BAG to export firearms controlled under ECCNs 0A501.a or .b, shotguns with a barrel length less than 18 inches controlled under ECCN 0A502, or ammunition controlled under ECCN 0A505, without the submission by individuals of data in AES. The proposed language in new paragraph 758.10(b)(2) would require non-U.S. persons exiting the U.S. to file export information in the AES system. All the arguments set forth above regarding why AES is the wrong system for individuals to use are equally applicable here. We incorporate them by reference.

RECOMMENDATION VIII.B.: We request that BIS delete the new restrictive wording added to paragraph 758.1(c)(1) and wording in 758.10(b)(2) requiring information to be filed in AES. We note that BIS has indicated that it would only include this requirement if the AES system

was appropriately revised and simplified for use by individuals. Since it is unlikely that such a change could occur prior to publication of a final rule, we request the deletion of the section.

IX. Part 762 Recordkeeping

A. Delete Redundant Recordkeeping Requirements

The proposed revision to section 762.2(a) would add a new subparagraph 11 creating a new recordkeeping requirement for “serial number, make, model, and caliber of 0A501 .a and .b firearms, and shotguns with barrel length less than 18 inches.” This new provision would create an unnecessary and redundant regulatory burden. The Gun Control Act (GCA) is the regulatory framework for records pertaining to firearms. The recordkeeping requirements include acquisition and disposition of all firearms, regardless of whether they are shipped within the US or overseas. The GCA requires all Federal Firearm Licensees (FFL’s) to maintain firearm records. In particular, the GCA requires these records to be maintained for 20 years after the date of disposition. The proposed change requiring records under the EAR is therefore redundant. Further, it could also cause confusion because the EAR record retention period is 5 years, but the GCA’s period is 20 years. In complying with the stated provisions of the EAR, companies may inadvertently violate the GCA.

RECOMMENDATION IX.A: We ask BIS to delete the new requirement for “serial number, make, model, and caliber of 0A501 .a and .b firearms, and shotguns with barrel length less than 18 inches.” Instead, we suggest the paragraph make a cross-reference to the GCA-mandated recordkeeping provisions and that compliance with these requirements constitutes compliance with the EAR’s requirements in this regard.

B. Remove Proposed Recordkeeping Requirements for Warranties

Through a proposed exception to existing recordkeeping exemptions in section 762.3(a), BIS would impose recordkeeping requirements “**for a warranty certificate issued for an address outside the US** for any firearm controlled in ECCN 0A501.a and for shotguns with barrel length less than 18 inches controlled in 0A502.” In its preamble, BIS acknowledges that this amendment “would be an **expansion of the EAR recordkeeping requirements**, but because warranty certificates are already created and kept as part of normal business recordkeeping purposes, this expansion is not anticipated to create any new or increased burden under the EAR, because it is a document that is created in the normal course of business and are records that should be easily accessible. These recordkeeping requirements would assist the United States Government because this information is important to have access to for law enforcement concerns for these types of items.” We struggle to see any understandable rationale for this requirement. Such warranties are not related to the export in any way, and a warranty certificate is not an export control document.

Moreover, warranties are issued by the manufacturer, not the exporter. Many manufacturers do not always issue specific “warranty certificates” to individuals. It is, therefore, not a record kept in the normal course of business. Most manufacturers provide warranty statements in a broad boilerplate statement included in an instruction manual, or on their website. There is thus no

way to know when that information is accessed by a foreign person or sent to “an address outside the US.” There is also the possibility that retaining such information may violate the privacy laws of other countries, such as the General Data Protection Regulation (GDPR) (EU).

RECOMMENDATION IX.B.: BIS has asked for comments on whether the public agrees with the above described changes. We do not agree to the changes and have noted that they represent increased compliance burdens for exporters under the EAR that are not present in the ITAR. BIS has not provided a coherent explanation for why the new recordkeeping burden makes sense, is related to exports, or would be of benefit to the enforcement of the export control laws. We therefore request BIS delete the proposed addition.

X. Recommendation for Effective Date of Final Rule

Throughout the reform effort and during transitions of items from the USML to the CCL, the relevant final rules for most other categories had an effective date of 180 days after publication. This gave exporters of those commodities sufficient time to reclassify their products and implement changes in their enterprise systems to become compliant with the EAR. The later effective date also allowed those companies to continue to obtain export licenses from DDTC without loss of business in the interim. The regulatory change for firearms and ammunition will affect many exporters and involve a significant number of export licenses. Most of these companies have had little exposure to the EAR and will require significant training and outreach to understand the new regulations. The extended effective date will allow these firearm and ammunition exporters sufficient time to learn and implement EAR-centric processes and procedures while still continuing to do business in the ordinary course.

RECOMMENDATION X: NSSF recommends a 180-day effective date for the final rule.

XI. Items Controlled for Firearms Convention (FC) Reasons Destined for End Use in Canada

The proposed amendments to section 742.17(f) would require licenses for the export of FC Column 1 items to Organization of American States (OAS) members, including Canada. The items affected are those controlled by ECCNs 0A501 (except 0A501.y), 0A502, 0A504 (except 0A504.f), and 0A505 (except 0A505.d). 83 Fed. Reg. at 24185. Unchanged would be the licensing policy for such items, which is that they be presumptively approved if their export is supported by an FC Import Certificate or equivalent, unless they are for a proscribed end use or end user. 15 CFR § 742.17.

Given the unique and long-standing defense trade and commercial relationships between the United States and Canada, the EAR generally does not require licenses for the export of items from the United States to Canada for end use in Canada, unless a proscribed person or end use is involved. Indeed, none of the uniquely military items that were formerly ITAR controlled that are now subject to the EAR require a license to export to Canada for end use in Canada. Under the proposed rule, however, non-military, widely available commercial FC-controlled items would have stricter licensing obligations than the same items for export to many other NATO

partners. The EAR is, thus, internally inconsistent in its licensing policies with respect to Canada.

We appreciate that BIS does not have discretion to remove completely licensing obligations for the export to Canada for end use in Canada of the shotguns and other items referenced in the proposed revisions to section 742.17(f) given the U.S. commitments to the OAS under the Firearms Convention described in the section. The U.S., however, does have discretion under the convention to define domestically what an OAS-compliant license would be.

RECOMMENDATION XI: Given that applications to export to Canada FC-controlled items will be presumptively approved if the Canadian government has issued to the importer the required possession and import permits, we ask that a proposed rule be created that would allow BIS to treat such Canadian-issued authorizations as satisfying the U.S. government's obligations under the Firearms Convention. If the Canadian government has already approved the import and the importer, there is little value-added in the United States authorizing exactly the same transaction separately. Such a change, we believe, will significantly reduce regulatory burdens -- for both exporters and the U.S. government -- associated with exports to Canada without harming national security objectives or Firearms Convention obligations. Moreover, we do not believe that the creation of such a rule would be a significant burden for BIS because BIS described several times during its weekly conference calls on the reform effort that one had already been created.

* * *

We appreciate your consideration of our comments. We would be happy to respond to any questions or concerns, or provide additional information. I can be reached at lkeane@nssf.org.

Sincerely,

A handwritten signature in black ink, reading "Lawrence G. Keane". The signature is written in a cursive, flowing style.

Lawrence G. Keane

PUBLIC SUBMISSION

As of: 7/12/18 11:46 AM Received: July 06, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-944k-mi51 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0374

Public Comment 984. Individual. Beth Katz. 7-6-18

Submitter Information

Name: Beth Katz

General Comment

See attached file(s)

Attachments

Beth Katz Public Comment Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

July 6, 2018

To: Office of Defense Trade Controls Policy, U.S. Department of State
Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of Commerce

In Reference to **FRN 2018-10366** (State) and **83 FR 24166** (Commerce).

I am writing to express my opposition to the proposed regulatory changes published in the Federal Register on May 24, 2018, as "[International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III](#)" (DOS_FRDOC_0001-4527) and "[Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List \(USML\)](#)" (83 FR 24166). The proposed changes raise significant concerns for me as a parent, as an American citizen and taxpayer, and as someone who has studied and wrote my graduate thesis on the international small arms trade.

As a parent of a young child, I am deeply concerned about the impact that these changes will have on both global and domestic security for the foreseeable future. The proposed changes would greatly diminish oversight of the export of semi-automatic assault weapons, high capacity ammunition clips and training on such military equipment. The suggested changes would make it more likely that these dangerous weapons will end up in the hands of traffickers, terrorists or cartels and used against US service members. This increases the likelihood for greater destabilization and conflict worldwide as well as for these weapons to be trafficked back into the U.S. for nefarious uses here. The new rule also removes the block on 3D printing of firearms. This will facilitate unregulated gun production in the U.S. and abroad by making it possible for anyone, anywhere, with access to a 3D printer to produce a lethal weapon. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, these changes could generate many preventable tragedies. These proposed changes will create a world that is less safe for my son and other children to grow up in and to live; and therefore should not be adopted.

As an American citizen, I believe that these proposed changes diminish U.S. credibility in the eyes of the international community and compromise our global leadership. The proposed changes call for transferring gun export licensing from the State Department, an agency with a mission to promote stability, conflict reduction, and human rights, to the Commerce Department, an agency with mission to promote trade. In doing this, we are retreating on our global commitment to human rights and acting as though the export of firearms is just another commodity when the impact of these weapons is far more consequential and deadly. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research shows that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are sought out weapons used by criminal organizations in Mexico and other Latin American countries to perpetrate most of the increasing and record levels of homicides in those countries. The U.S. should not be adopting policies like the proposed changes which amplify this. Rather, we should be working collaboratively, as we have under previous administrations, to find ways to prevent and reduce firearms from being used to carry out human rights violations and crime.

As a U.S. taxpayer, I also find these proposed changes to be fiscally irresponsible. The new rule would transfer the cost of processing licenses from gun manufacturers to U.S. taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of

tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and the Commerce Department does not charge any fee for licensing. This means that U.S. taxpayers, such as me, will absorb the cost of reviewing applications and processing licenses rather than the gun exporters that benefit from these sales. In addition, U.S. taxpayers also will need to shoulder the costs of having to build the capacity and expertise of the Commerce Department to properly administer the proposed changes. The Commerce Department currently does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce (see Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf>). The Commerce Department's Bureau of Industry and Security's enforcement office, who would be charged to oversee the new changes, does not have staff in Latin America, Africa, or many other parts of the world and is not equipped to take the same level of preventive measures for end-use controls. In stark contrast, the State Department, who oversees these items while they reside on the USML, has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. The Commerce Department does not have these resources and developing them will come at a substantial cost to U.S. taxpayers.

Finally, as someone who has studied and researched the international small arms trade, I can confidently say that greater regulation, not less as the proposed rule would enable, is needed to curb the disproportionate impact that these weapons have on fueling conflict, terrorism, and crime around the world. One particularly troubling part of the new rule is its reduction of end-use controls for gun exports. It would eradicate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department within State that compiles the U.S. Government's information on human rights violations, decreasing the ability to effectively stop weapons licenses from going to international human rights violators. End-use controls also are weakened by removing the registration of firearms exporters, a requirement since the 1940s. Under the current rules, registration of exporters lets the State Department check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. Migrating the licensing to the Commerce Department will remove new exporters and brokers of these firearms from the State Department database, losing an important part of the evidentiary trail that enables the prosecution of arms traffickers.

It is for all the reasons listed above that I urge you to reject the proposed changes and to keep the items currently listed on the State Department-administered US Munitions List (USML) intact.

Thank you for your time and consideration.

Sincerely,

Beth Katz
Omaha, Nebraska

PUBLIC SUBMISSION

As of: 7/12/18 10:51 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946f-n3f7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0355

Public Comment 985. Catholic Health Initiatives. Colleen Scanlon. 7-9-18

Submitter Information

Name: Colleen Scanlon

Organization: Catholic Health Initiatives

General Comment

See attached letter.

Attachments

CHI_Overseas gun sales_final



198 Inverness Drive West
Englewood, CO 80112

P 303.298.9100
catholichealthinitiatives.org

Submitted via regulations.gov

July 9, 2018

Wilbur Ross
Secretary
Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
1401 Constitution Avenue NW
Washington, DC 20230

Mike Pompeo
Secretary
Office of Defense Trade Controls Policy
Directorate of Defense Trade Controls
U.S. Department of State
2201 C Street NW
Washington, D.C. 20520

RE: RIN 0694-AF47 (Commerce) and RIN 1400-AE30 (State)

Dear Mr. Ross and Mr. Pompeo,

Catholic Health Initiatives appreciates the opportunity to comment on the proposed rules to address the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). Catholic Health Initiatives (CHI) is a faith-based nonprofit health system operating in 18 states with 100 hospitals and numerous other services and facilities that span the inpatient and outpatient continuum of care. As a Catholic organization, we feel a special call to reduce violence in our communities and around the world.

While these proposed rule touches many aspects of firearm regulation, sales and oversight, CHI is particularly concerned about the transfer of weapon sale regulation from the State Department to the Commerce Department and the negative effect this may have on violence around the world. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Catholic Health Initiatives

July 9, 2018

Rather, the rule proposes to transfer gun export licensing to the Commerce Department, whose principle mission is to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The types of weapons being transferred to Commerce Department control—including the AR-15, AK-47, and other military-style assault rifles and their ammunition—are among the deadliest personal-use weapons produced in the United States. We also understand they are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. The export of these weapons should be subject to more controls, not less.

We should not export American violence solely to boost economic development, competitive advantage, or other commerce-related goals. We strongly urge the Departments of Commerce and State to rescind this proposed rule.

Thank you for consideration of our comments on this important issue. If you have any questions, please contact me at 303-298-9100 or contact Laura Krausa, Director of Advocacy, at laurakrausa@catholichealth.net.

Sincerely,

A handwritten signature in black ink, appearing to read "Colleen Scanlon". The signature is fluid and cursive, with the first name "Colleen" and last name "Scanlon" clearly distinguishable.

Colleen Scanlon, RN, JD
Senior Vice President and Chief Advocacy Officer

PUBLIC SUBMISSION

As of: 7/12/18 10:44 AM Received: July 09, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-946i-ymie Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0351

Public Comment 986. Violence Policy Center. Kristen Rand. 7-9-18

Submitter Information

Name: Kristen Rand

Address:

1025 Connecticut Ave NW
Suite 1210
Washington, DC, 20036-5421

Email: krand@vpc.org

Phone: 2023874525

Organization: Violence Policy Center

General Comment

The comments of the Violence Policy Center are attached.

Attachments

Exports comments VPC Commerce RIN 0694-AF47

**COMMENTS OF THE VIOLENCE POLICY CENTER TO THE U.S. DEPARTMENT OF COMMERCE,
BUREAU OF INDUSTRY AND SECURITY**

RE: RIN 0694-AF47

Submitted via eRulemaking Portal

The Violence Policy Center (VPC) is a national non-profit educational organization working to reduce gun violence through research, public education, and advocacy. The VPC has a particular expertise in researching and monitoring the gun industry and we regularly issue reports and analyses regarding the industry and its products. The VPC has also done extensive research on cross-border gun trafficking.

The VPC has serious concerns regarding the rules proposed by the U.S. Departments of Commerce and State to transfer non-automatic and semi-automatic firearms and ammunition, as well as parts and related defense services currently controlled by Category I, II, or III of the U.S. Munitions List under the International Traffic in Arms Regulations (ITAR), to the control of the Export Administration Regulations (EAR). The proposed transfer would significantly weaken controls on small arms and ammunition and will result in a higher volume of export sales with less transparency and oversight. The ability to prosecute violations will also be impaired. The changes will enhance the risks that lethal weapons widely used for military purposes will end up in the hands of criminal organizations, human rights abusers, and terrorist groups.

The proposed rules treat semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. VPC research clearly demonstrates that the types of semi-automatic rifles, handguns, sniper rifles, large-capacity ammunition magazines, receivers, and other parts subject to the new rules are the types of weapons and accessories preferred by cross-border gun traffickers.¹ Moreover, many of the sniper rifles subject to the transfer are in use by military forces.² One particularly problematic rifle is the 50 caliber anti-armor sniper rifle that is capable of downing

¹ *An Ongoing Analysis of the Types of Firearms Illegally Trafficked from the United States to Mexico and Other Latin American and Caribbean Countries as Revealed in U.S. Court Documents*, Violence Policy Center: <http://www.vpc.org/indicted/>.

² “5 Sniper Rifles That Can Turn Any Soldier into the Ultimate Weapon: 5 guns no one wants to go to war against,” *The National Interest*, March 11, 2018: <http://nationalinterest.org/blog/the-buzz/5-sniper-rifles-can-turn-any-soldier-the-ultimate-weapon-24851>.

aircraft on take-off and landing and can pierce light armor.³ In addition, these rifles have been identified as a national security threat by a number of experts and entities.⁴

The devastation that semi-automatic firearms equipped with large-capacity ammunition magazines can inflict is demonstrated by their common use in mass shootings in the United States.⁵

Regarding whether the items described in the proposed rules are widely available in commercial outlets, an issue about which comment has been requested, many of the items are rapidly becoming less available in the United States. Six U.S. states and the District of Columbia prohibit retail sale of semi-automatic assault rifles. Eight states and the District of Columbia ban large-capacity ammunition magazines. Several large retail chain stores have acted to stop the sales of semi-automatic firearms and large-capacity ammunition magazines. For example, Walmart does not sell semi-automatic assault weapons. The store does not sell handguns, except in Alaska. They also do not sell large-capacity ammunition magazines.⁶

Other large retail outlets, such as Dick's Sporting Goods, have recently acted to stop the sales of semi-automatic assault weapons (which the gun industry euphemistically calls "modern sporting rifles"). Dick's is even destroying its unsold inventory of assault weapons.⁷ Finally, many countries prohibit civilian possession of semi-automatic rifles and handguns and the trend is toward prohibiting such weapons. For example, Norway is moving to ban semi-automatic firearms as of 2021. In 2011, Norway experienced one of the worst mass shootings outside of the U.S. The shooter used a Sturm Ruger Mini-14 semi-automatic rifle and a Glock semi-automatic handgun to kill 69 people at a youth camp. Both of these weapons are examples of those that will be transferred to Commerce's control under the proposed rules.

³ For more information on the capabilities of 50 caliber sniper rifles, see the Violence Policy Center's resource page: <http://www.vpc.org/regulating-the-gun-industry/50-caliber-anti-armor-sniper-rifles/>.

⁴ *National Security Experts Agree: 50 Caliber Anti-Armor Sniper Rifles Are Ideal Tools for Terrorists*, Violence Policy Center, 2005: http://www.vpc.org/fact_sht/snipersecurityexperts.fs.pdf.

⁵ See, for example, Violence Policy Center list of mass shootings involving high-capacity ammunition magazines: http://www.vpc.org/fact_sht/VPCshootinglist.pdf.

⁶ Walmart Statement on Firearms Policy, accessed on July 3, 2018: <https://news.walmart.com/2018/02/28/walmart-statement-on-firearms-policy>.

⁷ "Dick's Sporting Goods plans to destroy all the assault rifles it pulled off its shelves," *CNN*, April 19, 2018: <https://www.cnn.com/2018/04/19/us/dicks-sporting-goods-guns-trnd/index.html>.

Many semi-automatic rifles are also easily converted to fully-automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The rules will enable the production and distribution of 3D-printed firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printed firearms, the State Department successfully charged him with violating arms export laws since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to take similar action once such weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. This change alone could generate many preventable tragedies while changing the landscape of firearm manufacture, distribution and regulation.

The proposed rules would revise License Exception BAG to allow U.S. citizens and permanent resident aliens temporarily leaving the U.S. to take up to three non-automatic and semi-automatic firearms and up to 1,000 rounds of ammunition for such firearms for personal use while abroad (License Exception BAG). Currently, BAG applies only to non-automatic firearms. The proposed rules create a new exception for semi-automatic firearms and also revise the current rule to allow nonresident aliens leaving the U.S. to take firearms “accessories,” “attachments,” “components,” “parts,” and ammunition controlled by 0A501 or 0A505, provided that these were lawfully brought into the U.S.

The revision to the License Exception BAG is highly problematic considering that semi-automatic weapons can inflict catastrophic damage. If such a weapon is stolen or lost, there will little that can be done to recover the weapon. It will also be much easier for smugglers to take advantage of these exceptions to facilitate trafficking.

No justification is offered for changes to the current BAG framework. As described previously, semi-automatic weapons are prized by criminal organizations and the proposed change is likely to increase the risk of crime and violence.

The proposed rules would eliminate Congressional oversight for important gun export sales. Congress will no longer be automatically informed about sizable sales of these weapons. This change will limit the ability of Congress to comment on related human rights concerns, as it recently did on the Philippines and Turkey. In 2002, Congress acted to require it be notified of sales of firearms regulated by the U.S. Munitions List valued at \$1 million or more. Items moved to Commerce’s control would no longer be subject to such notification. In a September 15,

2017, letter, Senators Ben Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate congressional intent and effectively eliminate congressional oversight.⁸

The rules reduce end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

Gun manufacturers are extolling the new rules as an opportunity for increased profits in a climate of declining domestic sales.⁹ At the same time, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking weapons production would no longer apply to manufacturers of semi-automatic firearms. The government and taxpayers will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

CONCLUSION

The proposed rules would transfer gun export licensing to an agency – the Commerce Department – the principal mission of which is to promote trade. Firearms are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the

⁸ Letter to Secretary of State Rex Tillerson, September 15, 2017.

⁹ "Trump State Department Looks to Stream Line Firearms Exports & Open US Markets," *Ammoland*, May 15, 2018: <https://www.ammoland.com/2018/05/trump-state-department-looks-to-stream-line-firearms-exports-open-us-markets/#axzz5KDSkQJdz>.

types of weapons being transferred to the Commerce Department's control – including AR-15, AK-47, and other military-style assault rifles such as 50 caliber sniper rifles as well as their ammunition – are weapons of choice for criminal organizations in Mexico and other Latin American countries and are responsible for most of the increasing and record levels of homicide in those countries. The rules are certain to increase the volume of exports of these firearms. The export of these weapons should be subject to more controls, not fewer.

The proposed rules would significantly weaken export controls and oversight of many military firearms highly prized by terrorists, drug-trafficking organizations, and common criminals. Semi-automatic assault rifles, high-capacity ammunition magazines, sniper rifles (especially 50 caliber sniper rifles), and high-caliber firearms should remain on the United States Munitions List (USML).

The requirement that Congress be notified of all sales of former and USML-controlled firearms of more than \$1 million should be retained.

The provision authorizing license-free exports of semi-automatic rifles by citizens and legal permanent residents should be removed.

Respectfully submitted,

Kristen Rand
Legislative Director
Violence Policy Center
1025 Connecticut Ave NW
Suite 1210
Washington, DC 20036

PUBLIC SUBMISSION

As of: 7/12/18 10:40 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946i-gs5d
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0350

Public Comment 987. American Bar Association_Security Assistance Monitor and by Amnesty International USA. John Lindsay-Poland. 7-9-18

Submitter Information

Name: John Lindsay-Poland

Address: United States,

Email: johnlindsayapoland@gmail.com

General Comment

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. Please see the attached version for complete comment, sources, and notes.

The State Department proposed rule states that those weapons that would stay on the USML are inherently for military end use, adding that the items to be removed from the USML do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad. One State Department official reportedly said: We kind of refer to it as the Walmart rule. If its like something you can buy at a Walmart, why should we have control?

The Commerce Departments description of criteria for items to be moved off of the USML concludes: Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items. (p. 4) It adds that: There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities. However, the examples given here are not from prospective importing nations, but from the United States: Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their parts, components, accessories and attachments.

Retail availability in the U.S. should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively

different from nearly every market in the world: with 4.4% of the world's population, the U.S. comprises more than 45% of the world's firearms in civilian possession.

In addition, the statement neglects another significant portion of the worldwide market for firearms: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm. In the vast majority of countries, according to one of the few studies of firearms regulations, there is a presumption against civilians owning firearms unless certain conditions and requirements are met. (S. Parker, Small Arms Survey, 2011)

Many nations either do not permit or highly restrict civilian use of some or all types of semi-automatic firearms and high-capacity magazines proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms. Within the United States, semi-automatic rifles and high-capacity magazines are prohibited for retail sale in six states and the District of Columbia. Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries.

That purchase and possession of certain types of firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. Many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming.

States impose limitations on the retail availability, types of firearms that may be legally purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons. The potential and actual negative consequences of the ill use of such firearms are devastating. A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

The proposed rules do not articulate any requirement for a review by State Department experts on human rights and criminal organizations. If that is the proposers' intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

John Lindsay-Poland, Global Exchange

Attachments

GlobalExchange comment 9july2018

Comment on Proposed Rules on Categories i-ii-iii by Depts. of State and Commerce
 John Lindsay-Poland, Global Exchange

The below comment on the proposed rules by the Departments of State and Commerce supplements the comments submitted by the American Bar Association/Security Assistance Monitor and by Amnesty International USA, which we support. This comment focuses on the proposed criterion of wide retail availability for firearms and munitions proposed for transfer from the USML to the Commerce Department, and includes brief comments about inter-agency review and about risks of criminal use.

The State Department proposed rule states that those weapons that would stay on the USML “are inherently for military end use,” adding that the items to be removed from the USML “do not meet this standard, including many items which are widely available in retail outlets in the United States and abroad.” (p. 5) One State Department official was quoted in a press report about the proposed rule: “We kind of refer to it as the Walmart rule. If it’s like something you can buy at a Walmart, why should we have control?”¹

The Commerce Department’s description of criteria for items to be moved off of the USML concludes: “Thus, the scope of the items described in this proposed rule is essentially commercial items widely available in retail outlets and less sensitive military items.” (p. 4) It adds that: “There is a significant worldwide market for firearms in connection with civil and recreational activities such as hunting, marksmanship, competitive shooting, and other non-military activities.” (pp. 6-7) However, the examples given here are not from prospective importing nations, but from the United States:

“Because of the popularity of shooting sports in the United States, for example, many large chain retailers carry a wide inventory of the firearms described in the new ECCNs for sale to the general public. Firearms available through U.S. retail outlets include rim fire rifles, pistols, modern sporting rifles, shotguns, and large caliber bolt action rifles, as well as their ‘parts,’ ‘components,’ ‘accessories’ and ‘attachments.’” (p. 7)

The retail availability in the United States should not be a criterion, since this is not the market to which exports treated by the proposed rule will be directed. Moreover, the U.S. retail firearms market is qualitatively and quantitatively different from nearly every market in the world: the United States, with 4.4% of the world’s population,² comprises more than 45% of the world’s firearms in civilian possession.³

In addition, the statement neglects another significant portion of the “worldwide market for firearms”: criminal organizations, illegal armed groups, and armed security forces that commit human rights violations.

In many countries, the retail availability of all firearms is substantially limited. In Mexico, for example, there is only one retail outlet in the entire country for the legal purchase of any kind of firearm.⁴ In China, firearm purchases are banned for most people, and private gun ownership is almost unheard of.⁵ In the vast majority countries, according to one of the few studies of firearms regulations, “there is a presumption against civilians owning

firearms unless certain conditions and requirements are met.”⁶

Belize, Colombia, Israel, Japan, Kenya, Turkey, and United Kingdom do not permit any civilian use of some or all types of semi-automatic firearms proposed for removal from the USML, and so cannot be said to have any retail availability of these prohibited firearms.⁷ Other nations, including Australia, Canada, Croatia, India, Lithuania, New Zealand, South Africa, Switzerland apply special restrictions to civilian possession of semi-automatic firearms, such as proof that they are needed for self-defense, and so it cannot be said that these firearms are “widely available in retail outlets” there. We emphasize that these examples are from only a selected sample of 28 countries; a full accounting of countries where there is only limited or any retail availability of semi-automatic firearms would certainly show many more.⁸ Brazil also prohibits “assault weapons” for civilian purchase, while Chile and Colombia prohibit civilian possession of semi-automatic weapons entirely.⁹

Moreover, within the United States, semi-automatic rifles and high-capacity magazines such as those proposed to be removed from the USML are prohibited for retail sale in six states and the District of Columbia.

Magazines with a capacity of more than 10 rounds are not permitted for civilians in Australia.¹⁰ Brazil, France, Romania, Slovenia, Spain, and Turkey do not permit purchase by ordinary civilians of high-capacity magazines.¹¹ DDTC policy has reportedly excluded export of high-capacity magazines except to military and law enforcement end users,¹² but nothing in the proposed rule indicates that the Department of Commerce would enact such a policy.

Certain types of handguns and certain calibers of firearms that are included in Category I are also prohibited and not available for retail purchase in some countries. In the Dominican Republic, for example, “certain firearms are considered ‘war weapons’ and can only be used by government forces, including .45 calibre pistols [and] rifles,” according a Small Arms Survey study,¹³ while Spain prohibits civilian purchase of firearms with a caliber of 20 mm or higher, which are considered to be “designed for war use.”¹⁴ More types – in some cases all types - of handguns are prohibited for civilian purchase in Belize, Canada, Colombia, Japan, Kazakhstan, the Russian Federation, the United Kingdom, and Venezuela.¹⁵

That purchase and possession of certain types firearms and ammunition are permitted under national legislation does not necessarily indicate that these items are either widely available or feasible for most people to obtain. In addition to prohibitions or restrictions on retail availability of types of firearms, many countries deeply restrict retail availability of all firearms through licensing requirements, which are often extensive and time-consuming. In India, for example, obtaining a license to acquire a firearm requires the applicant to demonstrate training in use of a gun, and often takes years.¹⁶ Japan requires gun buyers to go through 12 processes before purchasing any type of firearm.¹⁷

States impose limitations on the retail availability, types of firearms that may be legally

purchased, and licensing process for parties seeking to purchase a firearm because they recognize that guns are not like ordinary commercial items that can be purchased at a store. In many countries, legal markets for firearms blend with illegal markets in vast grey areas of stolen and diverted weapons, and of private security companies. The potential and actual negative consequences of the ill use of such firearms are devastating.¹⁸ A coherent, ethical, and politically strategic approach to firearm exports would increase controls to help reduce violent harm by both state and non-state actors that will more easily acquire them under the proposed rules.

Processes for gun exports reflect substantive priorities and as such are integral to policy. The National Sports Shooting Foundation (NSSF) claims that under the proposed rule, “Applications would go through the same interagency review process, including by the Defense Department and the State Department’s human rights and other experts.”¹⁹ However, the proposed rules do not articulate any requirement for such a review by State Department experts on human rights and criminal organizations. If that is the proposers’ intent, the rule should state it clearly, and spell out the scope of license applications subject to such review, concurrences required, specifying from which bureaus and agencies, and the competencies of experts who shall conduct reviews.

¹ David Sherfinski, “Trump officials to roll back rules on some gun exports,” *The Washington Times*, May 1, 2018, <https://m.washingtontimes.com/news/2018/may/1/trump-officials-to-roll-back-rules-on-some-gun-exp/>. It should also be noted that Walmart does not operate in more than 100 nations (see: <https://corporate.walmart.com/our-story/our-locations> and that in the United States Walmart does not sell semi-automatic assault rifles, high capacity magazines, or even (except in Alaska) handguns. See: <https://news.walmart.com/2018/02/28/walmart-statement-on-firearms-policy>.

² <https://www.census.gov/popclock/>

³ Aaron Karp, *Estimating Global Civilian-Held Firearms Numbers*, Small Arms Survey, June 2018, at: <http://www.smallarmssurvey.org/fileadmin/docs/T-Briefing-Papers/SAS-BP-Civilian-Firearms-Numbers.pdf>

⁴ Kate Linthicum, “There is only one gun store in all of Mexico. So why is gun violence soaring?” *The Los Angeles Times*, May 24, 2018, <https://www.latimes.com/world/la-fg-mexico-guns-20180524-story.html>.

⁵ Ben Blanchard, “Difficult to buy a gun in China, but not explosives,” Reuters, October 2, 2015, at: <https://www.reuters.com/article/uk-china-security-idUSKCN0RV5QV20151002>.

⁶ Sarah Parker, “Balancing Act: Regulation of Civilian Firearm Possession,” chapter 9 in *States of Security: Small Arms Survey 2011*, Small Arms Survey, Geneva, p. 6, at: <http://www.smallarmssurvey.org/fileadmin/docs/A-Yearbook/2011/en/Small-Arms-Survey-2011-Chapter-09-EN.pdf>.

⁷ Parker, pp. 9-13; Law Library of Congress, *Firearms-Control Legislation and Policy*, 2013, at: <http://www.loc.gov/law/help/firearms-control/firearms-control.pdf>.

⁸ Parker, pp. 2, 9-13.

⁹ Lisandra Paraguassu, Ricardo Brito, “U.S. biggest source of illegal foreign guns in Brazil – report,” *Reuters*, January 10, 2018, <https://af.reuters.com/article/worldNews/idAFKBN1EZ2M3>.

David Gacs, Rachel Glickhouse, and Carin Zississ, “Gun Laws in Latin America’s Six Largest Economies,” Americas Society, January 11, 2013, <https://www.as-coa.org/articles/explainer-gun-laws-latin-americas-six-largest-economies>.

¹⁰ Law Library of Congress, p. 20.

¹¹ “Overview of gun laws by nation,” at: https://en.wikipedia.org/wiki/Overview_of_gun_laws_by_nation. France: <https://www.service-public.fr/particuliers/vosdroits/F2242>. Romania: <http://www.gandul.info/reportaj/exclusiv-20-000-de-romani-s-au-inarmat-in-2011-fostul-sef-de-la-arme-din-politie-stii-cat-e-valabil-avizul-psihiologic-pana-iesi-pe-usa-cabinetului-9375494>.

¹² Clif Burns, “High Capacity Magazines Exported from U.S. to Norway Shooter,” *ExportLaw Blog*, July 28, 2011, at: <https://www.exportlawblog.com/archives/3315>.

¹³ Parker, p. 8.

¹⁴ Law Library of Congress, p. 219.

¹⁵ Parker, pp. 9-13; Gacs, Glickhouse and Zissis.

¹⁶ Rama Lakshmi, “India already had some of the world’s strictest gun laws. Now it’s tightened them,” *Washington Post*, August 1, 2016, https://www.washingtonpost.com/world/asia_pacific/india-had-the-one-of-the-strictest-gun-laws-in-the-world-it-just-got-tighter/2016/08/01/affd9422-51da-11e6-b652-315ae5d4d4dd_story.html?utm_term=.f69ad52bfffcc.

¹⁷ 1. Take a firearm class and pass a written exam, which is held up to three times a year. 2. Get a doctor’s note saying you are mentally fit and do not have a history of drug abuse. 3. Apply for a permit to take firing training, which may take up to a month. 4. Describe in a police interview why you need a gun. 5. Pass a review of your criminal history, gun possession record, employment, involvement with organized crime groups, personal debt and relationships with friends, family and neighbors. 6. Apply for a gunpowder permit. 7. Take a one-day training class and pass a firing test. 8. Obtain a certificate from a gun dealer describing the gun you want. 9. If you want a gun for hunting, apply for a hunting license. 10. Buy a gun safe and an ammunition locker that meet safety regulations. 11. Allow the police to inspect your gun storage. 12. Pass an additional background review. Audrey Carlsen and Sahil Chinoy, “How to Buy a Gun in 15 Countries,” *The New York Times*, March 2, 2018, <https://www.nytimes.com/interactive/2018/03/02/world/international-gun-laws.html>.

¹⁸ Brazil provides an important example. See Rogert Muggah, “Where do Rio de Janeiro’s crime guns come from?” *openDemocracy*, August 8, 2016, <https://www.opendemocracy.net/democraciaabierta/robert-muggah/where-do-rio-de-janeiros-crime-guns-come-from>.

¹⁹ Larry Keane, “Why export control reform makes security and business sense,” National Shooting Sports Foundation, July 6 2018, <https://www.nssf.org/why-export-control-reform-makes-security-and-business-sense/>.

PUBLIC SUBMISSION

As of: 7/12/18 10:19 AM Received: July 09, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-946j-v4k9 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0349

Public Comment 988. Security Assistance Monitor Center for International Policy. Colby Goodman. 7-9-18

Submitter Information

Name: Colby Goodman

Address:

2000 M St NW
Suite 720
Washington, DC, 20036

Email: colby@ciponline.org

Phone: 2022323317

General Comment

Please find attached Security Assistance Monitor-Center for International Policy's concerns with the proposed firearms export changes.

Colby Goodman
Director
Security Assistance Monitor

Christina Arabia
Program and Research Associate
Security Assistance Monitor

William D. Hartung
Director
Arms and Security Project

Attachments

SAM-CIP Letter BIS Firearms Rule FINAL



Advancing a sustainable, just, and peaceful world

July 9, 2018

Mr. Steven Clagett
Office of Nonproliferation Controls and Treaty Compliance
Nuclear and Missile Technology Controls Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B, 14th Street and Pennsylvania Avenue NW
Washington, DC 20230

Re: Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML), RIN 0694-AF47

Dear Mr. Clagett,

We are writing to express our concerns about the U.S. Department of Commerce's proposed rule, published in the Federal Register on May 24, 2018, to transfer certain firearms, guns, ammunition, and related parts from the U.S. Department of State's U.S. Munitions List (USML) to the U.S. Department of Commerce's Commerce Control List (CCL) under a new 500 series designation. While we were pleased to see that the proposed rule maintained some important controls connected with the USML for the firearms moving to the CCL, we believe the proposed rule will mean more U.S. firearms will be exported with less transparency, fewer oversight mechanisms, and a weaker ability for the U.S. government to prosecute violations.

First, the transfer of certain firearms, guns, and ammunition from USML to the CCL appears to be fundamentally inconsistent with the scope of statutory authority outlined in the Arms Export Control Act (AECA). For more than three decades, the U.S. government has designated many types of firearms and guns that are proposed to move to the CCL as "Significant Military Equipment" (SME) because of their "substantial military utility or capability." According to the AECA, all defense articles designated as SME must be on the USML. While there may be more civilians using these types of weapons now than in the 1970s, most foreign militaries continue to use these types of firearms as standard issue and they continue to have substantial military utility. Moreover, the proposed rule's assertion that the firearms moving over to the CCL, including "Combat Shotguns" and

.50 sniper rifles, has “for the most part,” “civil, recreational, law enforcement, or other non-military applications” and thus deserve limited controls is highly questionable.

Second, because the term “defense article” is linked to several statutes with national security import, the removal of firearms, guns, ammunition, and certain parts from the USML means there would be many rippling implications of the transfer of items from the USML to the CCL under the AECA and the Foreign Assistance Act (FAA). The AECA is a sophisticated statutory framework that enables the United States to more effectively monitor a large volume of arms exports. The proposed transfer impacts various statutes linked to the AECA more broadly and creates ambiguity with the ability of Congress to monitor U.S. assistance to foreign countries through various notification and reporting requirements found in the AECA and the FAA. The transfer of arms to the CCL would undermine that framework.

As outlined in more detail in the below analysis, the U.S. government or the U.S. policy community would lose many key oversight tools and abilities to help prevent irresponsible or illegal firearms trafficking around the world as a result of these proposed changes. In particular, the U.S. government or U.S. policy community (Congress and the public) would have a limited ability to do the following:

- Halt or modify risky proposed firearms sales valued at \$1 million or more to countries such as to Honduras, Turkey, or the Philippines;
- Curb risky exports of pistol grips and magazine clips valued at \$500 or less to over 100 countries, including Mexico and Guatemala;
- Review proposed training on how to aim and fire a gun and other types of foreign police training to countries such as Libya or China;
- Stop nonresident aliens leaving the United States via commercial airlines from taking firearms “accessories,” “attachments,” “components,” “parts,” and ammunition;
- Better understand U.S. firearms manufacturing and ownership to identify risks within the U.S. firearms industry; and,
- Investigate and prosecute companies for failing to properly provide political contributions and marketing fees aimed at curbing corruption.

Additionally, the AECA only permits the sales of defense articles and services for specific reasons, including primarily for legitimate defense purposes.¹ Section 3 of the AECA requires the State Department to notify Congress when there is credible information that such articles or services were misused.² However, there is not a similar requirement connected with the Export Administration Regulations (EAR). The AECA also requires the State Department to publicly report on all authorized and delivered arms exports annually, which has provided Congress and the public with an essential tool to identify potentially illegal trafficking patterns and sales that are inconsistent with U.S.

¹ 22 U.S.C. § 2754.

² 2753(c)(2), <https://www.law.cornell.edu/uscode/text/22/2753>; For more information, see https://www.americanbar.org/content/dam/aba/administrative/human_rights/ABACHRAAssessmentofArmsSalestoSaudiArabia.authcheckdam.pdf

policy. However, the Commerce Department does not have this same requirement nor does it regularly provide the same level of transparency as the State Department.

We are pleased to see that the proposed rule attempts to maintain effective oversight of arms brokers by ensuring that brokers must register and seek a license. These provisions are critical in helping mitigate illegal arms trafficking to major conflict zones and transnational criminal organizations. However, we are concerned that the basis for the State Department's rules is subject to legal challenge because it is not clear that the State Department has the statutory authority to maintain brokering controls if firearms are transferred from the USML. Similarly, we are concerned about the U.S. government's statutory basis to halt arms transfers based on human rights concerns. In 2014, Congress amended the FAA to prohibit the export of Series 600 items to countries "the governments of which engage in a consistent pattern of gross violations of internationally recognized human rights."³ If the proposed rule moved forward as is, the State Department would no longer have a statutory basis for vetoing a proposed sale on human rights grounds for firearms, guns, ammunition, and related parts that move to the CCL.

Given the potential loss of so many U.S. arms export controls and likely negative impact on curbing irresponsible and illegal arms transfers, we encourage you to wait until the Government Accountability Office finishes its analysis of the risks of moving firearms from the USML to the CCL until you move forward on this proposal. If you have decided you want to move forward with moving some firearms, guns, and related parts over to the CCL, we recommend making the below changes to the proposed rule:

- Recognize that semi-automatic firearms are still a weapon of choice for foreign militaries and of significant military value and place firearms under the 600 Series list on the CCL;
- Maintain the requirement to notify Congress and the public of any proposed firearms sales that reach \$1 million or more;
- Limit companies use of the Limited Value Shipments (LVS) license exception to \$100 or severally limit the types of parts and components that are available for the \$500 threshold value;
- Expand the definition of "technology" to capture defense-service type activities that would otherwise be left unregulated such as private security contractor training to foreign police with firearms. Similarly, 3D printing should be considered technology under the EAR;
- Remove or limit the registration fee for manufactures but keep the requirement for the registration;
- Add a mechanism to the CCL that would retain the reporting requirement on political contributions and marketing fees that were paid as part of arms sales.

³ 22 U.S.C. Sec. 2304. 22 USC 2304(a) establishes that no security assistance can go to a country with consistent pattern of gross human rights. 22 USC 2304(d)(2)(C)(ii) defines security assistance to include a license of 600-series items intended for armed forces, police, intelligence or other internal security forces.

For more details on some of these concerns, we are pleased to submit the below report, which provides more details on these main concerns and recommendations. We look forward to speaking with you or any of your colleagues about these important issues. Thank you for the opportunity to submit our comments and recommendations.

Sincerely,



Colby Goodman
Director
Security Assistance Monitor

Sincerely,



Christina Arabia
Program and Research Associate
Security Assistance Monitor



William D. Hartung
Director,
Arms and Security Project

Section-by-Section Key Concerns on Proposed Firearms Export Rule

Congressional Notification Requirement

Proposed Change

Under Section 36(c) of the AECA,⁴ if a sale of \$1 million worth of Category I firearms is authorized for export under the ITAR, the President must formally notify Congress 30 days prior to the approval of the ITAR export authorization. Both this formal notification process and the prior informal one provides Congress with the opportunity to review these proposed sales and ensure they are consistent with U.S. law, policy, and interests. Under the current system, if Congress does not agree with the executive branch decision to license the firearms export, it may block or modify the proposed sale. If Category I items are moved to EAR controls, they will not be subject to the AECA notification requirement.

Main Concerns

In the mid 1990s, Congress began requiring the administration to notify it of proposed firearms sales of \$1 million or more because of concerns about the role firearms have consistently played in inflicting serious harm on civilians in conflict and non-conflict zones. Since then, the requirement has allowed both Congress and the public to provide important oversight of U.S. firearms exports. Over the past ten years, Congress has also halted or modified several particularly problematic proposed firearms sales. Just last year, for instance, Congress blocked the sale of semi-automatic handguns and assault rifle sales to the Philippines and Turkey because of concerns that they would be used unlawfully against civilians.⁵ As these congressional notifications are often provided to the public, they have also given the U.S. foreign policy community an opportunity to provide insights on particular risky U.S. firearms sales.

As U.S. companies continue to propose firearms sales to risky countries, it is critical for Congress to maintain its oversight on major sales. From January to December of 2017, the Trump Administration requested Congress to approve at least \$662 million in Category I firearms and ammunition exports to over 15 countries through the congressional notification process.⁶ Of these, potential firearms sales to El Salvador, Honduras, Indonesia, Mexico, Thailand, Turkey, and the United Arab Emirates raised concerns amongst the human rights community and required necessary scrutiny by Congress. In the case of Honduras, Congress had raised several questions to help ensure

⁴ 22 U.S.C. § 2776(c)

⁵ <http://www.middleeasteye.net/news/us-halts-arms-sales-erdogan-bodyguards-1467964562>;
<https://www.reuters.com/article/us-philippines-usa-rifles-idUSKBN12V2AM>

⁶ For more details see Security Assistance Monitor's factsheet, "Congressional Notifications for Proposed U.S. Commercial Firearms Exports in 2017," available at http://securityassistance.org/fact_sheet/congressional-notifications-proposed-us-commercial-firearms-exports-2017

that U.S. weapons would not be used to fire on civilian protestors. These notifications also helped U.S. civil society identify important trends in U.S. firearms sales such as in licensed production.

Recommendation

For these reasons, it is critical that the new rule continue to require the U.S. administration to notify Congress of any proposed firearms sales that reach \$1 million or more.

License Exception LVS (§ 740.3) / License Exception BAG (§ 740.14)

Proposed Changes

Under the proposed rule, U.S. companies are given new opportunities to export certain firearms parts and components without U.S. government prior approval if the net value of the shipment is at or below \$500, which is higher than the \$100 threshold under ITAR. In particular, U.S. companies can use the Commerce Department's License Exception Shipments of Limited Value (LVS) to avoid the license requirement for exports of certain firearms "parts," "components," "accessories," and "attachments", including pistol grips and detachable magazines, to over 100 countries in Country Group B.⁷ Guns and armament and related items controlled under ECCN 0A602 are also eligible for LVS with a limit of \$500 net value per shipment. Further, the rule adds a license exception under LVS for ammunition parts and components with a limit of \$100 per shipment.

The proposed rule would also revise License Exception BAG to allow U.S. citizens and permanent resident aliens temporarily leaving the United States to take up to three non-automatic *and* semi-automatic firearms under 0A501 and up to 1,000 rounds of ammunition for such firearms controlled under 0A505.a for personal use while abroad. Currently, BAG is authorized only for non-automatic firearms. The proposed rule carves out a new exception for semi-automatic firearms and revises the current framework to allow nonresident aliens leaving the U.S. to take firearms "accessories," "attachments," "components," "parts," and ammunition controlled by 0A501 or 0A505, provided that these were lawfully brought into the United States.

Main Concerns

Over the past decade, U.S. criminal prosecutions and research studies have shown how the smuggling of small numbers of firearms on a regular basis can have a large impact on gun violence in Mexico and Central America.⁸ Indeed, trafficking experts have long

⁷ See <https://www.bis.doc.gov/index.php/documents/regulation-docs/452-supplement-no-1-to-part-740-country-groups/file>.

⁸ Small Arms Survey, "Drips and Drabs: The Mechanics of Small Arms Trafficking from the United States," Issue Brief, March 2016, online at <https://www.files.ethz.ch/isn/196408/SAS-IB17-Mechanics-of-trafficking.pdf>.

argued that “small arms and spare parts are the lifeblood of the gray market.”⁹ Instead of trying to improve U.S. efforts to stop this smuggling, the proposed rule seems more aimed at limiting or complicating U.S. government efforts to stop the smuggling of U.S. firearms and relate parts. The new \$500 net value per shipment value under LVS could significantly expand the number of shipments of firearms components such as pistol grips and magazine clips that the U.S. government will not have a chance to review. Similarly, the expansion of the license exception BAG will likely make it harder for the U.S. government to stop the export of potentially problematic exports of semi-automatic firearms at the U.S. border to many countries around the world, including Mexico and in Central America.

Parts and Components Under LVS: Under the proposed changes to LVS, U.S. companies could export the following types of firearms parts and components without a U.S. license to over 100 countries, including Guatemala, El Salvador, Mexico, Somalia, South Sudan, Yemen, and the Philippines if the net value per shipment was \$500 or less:

- 1) “barrels, cylinders, barrel extensions, mounting blocks (trunnions), bolts, bolt carriers, operating rods, gas pistons, trigger housings, triggers, hammers, sears, disconnectors, pistol grips that contain fire control “parts” or “components” (e.g., triggers, hammers, sears, disconnectors) and buttstocks that contain fire control “parts” or “components;” and,
- 2) “detachable magazines with a capacity of greater than 16 rounds “specially designed” for a commodity controlled by paragraph .a or .b of this entry. “

The rule also allows companies to use the LVS for guns and armament related items under ECCN 0A602 in addition to ammunition parts, which can easily be used to make one’s own ammunition.¹⁰ As many of these parts are relatively inexpensive, especially if used, it’s possible for companies or individuals to export many items in one shipment without a U.S. license. Following common practice, firearms traffickers may also increase their number of shipments of firearms components that significantly increase lethality such as pistol grips and magazine clips to questionable clients. Taken together, the U.S. government will lose the ability to stop many types of sales to problematic destinations and end-users.

Semi-Automatic Firearms Under BAG: Over the past five years, U.S. researchers have highlighted how individuals have successfully trafficked U.S. firearms to Mexico and Central America and beyond via commercial airlines using temporary export licenses similar to the BAG license exception.¹¹ While anyone traveling on a plane needs to

⁹ William J. Lowell, Comments on Public Notice 7256 Amendment to the International Traffic in Arms Regulations: Revisions of U.S. Munitions List Category VII; and Public Notice 7257 Revisions to the USML (Feb. 7, 2011)

https://www.armscontrol.org/system/files/Lowell_Comments_ExportReform_Feb7_2011.pdf
¹⁰ <https://taskandpurpose.com/ammo-expensive-heres-make/>; <https://www.skilledsurvival.com/how-to-make-your-own-ammo/>; <https://www.offthegridnews.com/self-defense/guns-ammo/what-will-i-need-to-make-my-own-ammo/>

¹¹ Small Arms Survey, “Dribs and Drabs,” March 2016. Colby Goodman, “U.S. Firearms Trafficking to Guatemala and Mexico,” Working Paper, Woodrow Wilson Center, April 2013, online at

declare their firearm(s) to a U.S. CBP officer at the port of departure, CBP officers do not conduct a risk assessment similar to what the State or Commerce Department would do to help prevent U.S. firearms from being misused or diverted at the destination point. In addition, if a U.S. person overseas is robbed of or loses a semi-automatic firearm, there is little recourse from the United States. Nefarious actors who are cognizant of this exception could more easily facilitate semi-automatic firearm transfers abroad acting in concert with a U.S. citizen or permanent resident alien.

Not dissimilar from the points mentioned in the section on LVS, it is also troublesome that the BAG exception allows for nonresident aliens leaving the United States to take firearms “accessories,” “attachments,” “components,” “parts,” and ammunition controlled by 0A501 or 0A505. The U.S. government lacks jurisdiction over nonresident aliens while abroad. This exception will increase the number of firearms parts and ammunition that are currently allowed to be transported overseas, many of which are already contributing to epidemic levels of violence in Latin America.¹² In fact, as many as a quarter to half of all guns seized by police in Honduras, Guatemala, and El Salvador and submitted for tracing by the Bureau of Alcohol, Tobacco, Firearms and Explosives have been sourced to the United States.¹³

Recommendation

For these reasons, we believe the proposed BAG provision authorizing license-free exports of semi-automatic rifles by citizens and legal permanent residents be revised to allow the U.S. government to have more oversight before such a license exception is used. In order to allow the U.S. government to review many risky license requests of firearms components around the world, we also encourage you to limit companies use of LVS to \$100 or severally limit the types of parts and components that are available for the \$500 threshold value.

Controls on the Export of Services and 3D Printing

Proposed Change

Under the ITAR, companies must apply for a license with the State Department to export “defense services” to foreign entities. Defense services include items such as providing assistance or training to foreign persons in the design, development, manufacture, production, repair, maintenance, and operation of weapons on the USML. Companies must also request a license if they seek to provide military training to foreign units and forces. However, the Commerce Department’s CCL does not have a similar defense services rule for items moving from the USML to the CCL. Instead, EAR controls are

https://www.wilsoncenter.org/sites/default/files/US%20Firearms%20to%20Guatemala%20and%20Mexico_0.pdf.

¹² New Data Reinforces Link Between Guns, Violence in Latin America, available at

<https://www.insightcrime.org/news/brief/new-data-reinforces-link-guns-violence-latin-america/>.

¹³ American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, available at

<https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/>.

focused more on technology transfers. Additionally, the new rule would likely mean that the U.S. companies would no longer be prohibited from publishing 3D gun plans on the Internet.

Main Concerns

As the current rule is written, the U.S. government will likely lose oversight on many types of defense services that could pose real risks to U.S. national security interests. Today, U.S. defense companies regularly receive U.S. approval to provide over \$40 billion in defense services a year to over 100 countries.¹⁴ Under the proposed rule, however, U.S. companies may be able provide a wide range of training activities, design and development assistance, testing, and production assistance on firearms and ammunition to foreign persons without sufficient U.S. oversight. In particular, a U.S. company would likely no longer be required to obtain U.S. government approval before they provided training to foreign security forces around the world on how to aim and fire certain guns. Further, when anyone that has access to 3D printing machines is able to obtain plans on how to build a gun, this circumvents U.S. laws that seek to prevent known criminals from obtaining U.S. firearms.

Narrow Definition of Technology: As the proposed rule identifies “the EAR does not include a concept of ‘defense services’ and the ‘technology’ related controls are more narrowly focused and apply in limited contexts as compared to the ITAR.” The technology “required” for the development, production, or operation of semi-automatic firearms would be controlled. But the definition of “required” as applied to “technology” relates only to that portion of “technology” which is “peculiarly responsible for achieving or exceeding the controlled performance levels, characteristics or functions.” Therefore, training a foreign person in the United States or abroad would only require a license if the assistance involved the release of controlled technology. That means companies may be able to provide a wide range of training activities, design and development assistance, testing, and production assistance on firearms and ammunition to foreign persons without sufficient scrutiny and oversight.

Private Security Contractors: As U.S. private security contractors continue to pursue training opportunities with foreign security forces in countries such as Libya and China, it remains critical that the U.S. government maintain oversight of U.S. private security contractor activities.¹⁵ At the moment, a U.S. private security contractor seeking to sell training to foreign police units on how to aim and fire semi-automatic weapon must

¹⁴ Security Assistance Monitor, Arms Sales Database, Direct Commercial Sales Services, accessed on July 6, 2018, online at <http://securityassistance.org/data/country/arms/Direct%20Commercial%20Sales%20Services/2012/2017//Global/all>.

¹⁵ Matthew Cole and Jeremy Scahill, “Eric Prince in the Hot Seat,” The Intercept, March 24, 2016, online at <https://theintercept.com/2016/03/24/blackwater-founder-erik-prince-under-federal-investigation/>. Marc Fisher, Ian Shapira, and Emily Rauhala, “Beyond Eric Prince’s China Venture,” The Washington Post, May 4, 2018, online at https://www.washingtonpost.com/news/world/wp/2018/05/04/feature/a-warrior-goes-to-china-did-erik-prince-cross-a-line/?noredirect=on&utm_term=.15fb0693b992

obtain a license. But, the new rule would likely allow a U.S. company to avoid this license requirement if the company did not also export firearms as part of the training. It also means that some past enforcement actions, such as the deferred prosecution agreement with the private security company formerly known as Blackwater, which included violations related to the export of small arms, ammunition, and training of foreign security forces in Sudan, Iraq, and Afghanistan, could be compromised.¹⁶ The new rule could also create an unfortunate scenario where U.S. private security contractors are able to provide services to foreign security units or militias that are otherwise prohibited from receiving training through U.S. foreign security aid.

3D Printing: In *Defense Distributed v. United States Department of State*, 838 F.3d 451 (5th Cir. 2016), the Fifth Circuit determined that posting 3D gun instructions, which constituted an export of controlled technical data under the ITAR, was not an infringement on the First Amendment. But the proposed BIS rules suggest that information posted on the internet would not be subject to EAR controls. The rules state that “*the EAR includes criteria in part 734 that would exclude certain information and software from control. For example, if a gun manufacturer posts a firearm’s operation and maintenance manual on the internet, making it publicly available to anyone interested in accessing it and without restrictions on further dissemination (i.e., unlimited distribution), the operation and maintenance information included in that published operation and maintenance manual would no longer be “subject to the EAR.” (See §§ 734.3(b) and 734.7(a).)*” If information published online would not be subject to the EAR, then 3D plans for guns published online would be outside the scope of export controls under the proposed rules. We are greatly concerned about the loss of controls on 3D gun-printing plans, which has increasingly assisted bad actors in enhancing their capabilities to inflict atrocities around the world.

Recommendations

We recommend that the final rule expand the definition of “technology” to capture defense-service type activities that would otherwise be left unregulated. More specifically, it will be critical to ensure that a final rule requires U.S. companies to request a license to furnish training on the use of firearms to foreign security forces, support for design and development assistance, testing, and production assistance on firearms and ammunition. To ensure that criminal organizations do not have the capability to easily build firearms, it will be critical that design and development information related to semi-automatic firearms, including 3D printing plans for guns, be considered controlled “technology” under the EAR.

Registration Requirement for Manufacturers

Proposed Change

¹⁶ <https://archives.fbi.gov/archives/charlotte/press-releases/2012/academi-blackwater-charged-and-enters-deferred-prosecution-agreement>

The transfer of certain Category I-III items from the USML to the CCL means that manufacturers and exporters, as well as providers of defense services, of those items will no longer be required to register with the State Department's Directorate of Defense Trade Controls (DDTC) or with any U.S. government entity before engaging in manufacturing or exporting certain firearms, ammunition, and related parts and components. In other words, exporters and manufactures will not longer be subject to the U.S. government requirement under 22 C.F.R. 122.1, which states that *"any person who engages in the United States in the business of manufacturing or exporting or temporarily importing defense articles, or furnishing defense services, is required to register with the DDTC. A manufacturer who does not engage in exporting must nevertheless register."*

Main Concerns

The State Department requirement for companies and individuals to register before they engage in the manufacturing or exporting is an important tool for the U.S. government to better understand the nature of the firearms industry, including who owns and controls key items and technology of significant military value. It provides the U.S. government with valuable data on manufacturers, government contractors, and importers. While some data on exporters will still be available through Commerce Department required export licenses, not all U.S. manufacturers regularly export or are required to submit a license for export. This loss of documented evidence on firearms manufacturing could severely hamper U.S. law enforcement investigations and the prosecution of arms dealers or others found in violation of AECA.

New Types of Manufacturing: In 2016, U.S. registration for firearms manufacturing activities was deemed so important that DDTC issued specific guidance providing that the below broad range of activities constitute "manufacturing" and thus require registration. The below activities were likely added because of concerns about illicit firearms trafficking and an inability to identify some new or uncommon types of manufacturing. However, this new guidance will not apply to Category I-III items moving to the CCL.

- a) Use of any special tooling or equipment upgrading in order to improve the capability of assembled or repaired firearms;
- b) Modifications to a firearm that change round capacity;
- c) The production of firearm parts (including, but not limited to, barrels, stocks, cylinders, breech mechanisms, triggers, silencers, or suppressors);
- d) The systemized production of ammunition, including the automated loading or reloading of ammunition;
- e) The machining or cutting of firearms, e.g., threading of muzzles or muzzle brake installation requiring machining, that results in an enhanced capability;
- f) Rechambering firearms through machining, cutting, or drilling;
- g) Chambering, cutting, or threading barrel blanks; and
- h) Blueprinting firearms by machining the barrel.

Company Acquisition Data: DDTC registrants are required to notify the State Department within five days of the effectuation of a transaction if the registrant is either a target or a buyer in an acquisition. If a foreign buyer is acquiring a DDTC registrant, a notification must be provided to DDTC 60 days prior to the transaction's effectuation. One of the reasons these notifications are critical is to understand who owns and controls manufacturers of items and technology that could be used to harm U.S. foreign policy interests and, in the case of foreign buyers, pre-notification allows the government to take action and ask questions if there are concerns with a non-U.S. company owning a manufacturer or exporter of controlled items.

Recommendation

While some U.S. companies may make the argument that the registration fee (\$2,250 a year for most exporters) is an economic burden, establishing a threshold for annual revenues could easily solve this issue. If a company does not meet this threshold, their registration fee may be waived. If the proposed rules go into effect, we recommend that the U.S. government establish a registration requirement for manufacturers of the items that are transferring from the USML to the CCL, including the 2016 DDTC guidance, in order to provide for the transparency and accountability needed to identify risk and support U.S. law enforcement investigations.

Reporting Requirements on Political Contributions and Fees

Proposed Change

Finally, the transfer of certain Category I, II, and III items from ITAR to EAR control will mean the loss of the reporting requirements outlined in 22 C.F.R. §130. ITAR's Section 130 requires exporters to report payment of certain political contributions, fees, and commissions related to the sale of defense articles and services to the armed forces of a foreign country or international organization to the DDTC. These reporting requirements were implemented to address concerns about the growing use of agents, advisers, and consultants to obtain business in international defense trade.

Section 130.9 mandates that license applicants disclose to the DDTC political contributions in an aggregate of \$5,000 or more and fees or commissions in an aggregate of \$100,000 or more that the applicant or its vendors have paid or agreed to pay related to the sale for which the license is requested. The same disclosure requirements are imposed upon suppliers, which the regulation defines as "any person who enters into a contract with the Department of Defense" for the sale of defense articles or defense services valued in an amount of \$500,000 or more.¹⁷ Section 130.10 requires that applicants and suppliers furnish detailed information related to the sale (such as the total contract price and the name and nationality of each foreign purchaser) and its related political contributions, fees, or commission to the DDTC. Section 130.12 requires vendors to disclose to the applicant or supplier any political contributions, fees, and commissions paid in relation to the sale. Finally, section 130.14 imposes strict recordkeeping

¹⁷ See 22 C.F.R. §130.7.

requirements on each applicant, supplier, and vendor, requiring each to maintain records of any information it furnished or obtained in compliance with Section 130 for at least five years following the date of the report submitted to the DDTC. As the proposed rule will move certain Category I, II, and III items from ITAR control, Section 130 disclosures will no longer be required when obtaining licenses to export those items.

Main Concerns

In many countries around the world, corruption is rampant within their arms procurement systems, as foreign officials seek to steal funds from their national budgets for their personal gain. In Nigeria, this type of corruption helped hollow out the military and made it more difficult for them to effectively combat Boko Haram.¹⁸ In response to similar types of concerns, the U.S. Congress adopted the above reporting requirements to help the U.S. government stop bribery and other fraudulent schemes within the international arms trade. However, this is still a challenging task. According to an earlier Commerce Department report, the United States became aware of "significant allegations of bribery by foreign firms in 294 international contract competitions valued at \$145 billion."¹⁹ Under the proposed rule, the Commerce Department would limit its ability to obtain useful information on U.S. defense companies and prosecute bribery.

Transparency: Section 130 reporting requirements encourage transparency within international defense trade and provide U.S. law enforcement with a useful tool to stop corrupt arms deals. At the moment, Section 130 disclosures are an important information-gathering tool through which the government gains access to useful data about arms trade transactions. Information such as the identities and countries of foreign purchasers and the recipients of donations to foreign governments and campaigns have political and diplomatic uses that extend beyond the arms industry. The loss of required Section 130 disclosures when obtaining licenses to export USML Category I, II, and III items means that the pool of useful data the government can access will become smaller. Just as the access to this data has benefits beyond the arms industry, the decrease in accessible data will have negative repercussions beyond the arms industry.

Prosecutions and Compliance Systems: The requirement that U.S. companies disclose payments made to solicit, promote, or secure the sale of defense articles or services to the armed forces of a foreign country or international organization is an effective anti-bribery and anti-corruption mechanism. The same can be said for the reporting requirements imposed upon suppliers. While U.S. companies may expectedly choose to avoid notifying the U.S. government of fees and contributions that could be considered bribery, U.S. law enforcement have used the provisions to pursue U.S. prosecutions against major defense companies. In 2010, for example, BAE Systems pleaded guilty and paid a \$400 million fine to the United States after being caught in a scandal to cover up, among other items,

¹⁸ Transparency International, "Weaponizing Transparency: Defense Procurement Reform as a Counterterrorism Strategy," May 2017, online at http://ti-defence.org/wp-content/uploads/2017/05/Weaponising_Transparency_Web.pdf.

¹⁹ Paul Holden, "Indefensible: Seven Myths that Sustain the Global Arms Trade," online at <https://projectindefensible.org/>.

payments made to “marketing agents” to help it secure arms contracts with Saudi Arabia. The company failed to disclose any fees paid to the agents.²⁰ The requirement is also a useful tool to encourage U.S. companies to have stronger compliance systems to identify and stop corruption.

Recommendation

In order to maintain important transparency and anti-corruption mechanisms on U.S. firearms sales, the U.S. government would benefit by adding a mechanism to the CCL that would retain the reporting requirement of Part 130.

²⁰ U.S. Department of Justice, “BAE Systems PLC Pleads Guilty and Ordered to Pay \$400 Million Criminal Fine,” March 1, 2010, online at <https://www.justice.gov/opa/pr/bae-systems-plc-pleads-guilty-and-ordered-pay-400-million-criminal-fine>.

PUBLIC SUBMISSION

As of: 7/12/18 10:15 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946j-87x3
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0348

Public Comment 989. Vista Outdoor. Julia Mason. 7-9-18

Submitter Information

Name: Vista Outdoor

Organization: Vista Outdoor

General Comment

RE: Comments on Proposed Rule RIN 0694-AF47 -- Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Vista Outdoor Inc., (Vista) is a leading global designer, manufacturer and marketer of consumer products in the growing outdoor sports and recreation markets. We serve these markets through our diverse portfolio of well-recognized brands that provide consumers with a range of performance-driven, high-quality and innovative products, including sporting ammunition and firearms, outdoor products, outdoor cooking solutions, outdoor sports optics, hydration systems, golf rangefinders, and accessories. We serve a broad range of end consumers, including outdoor enthusiasts, hunters and recreational shooters, professional athletes, as well as law enforcement and military professionals.

The majority of Vista brands exported that require BIS or DDTC authorizations are: Federal Premium, CCI, Speer ; Firearms: Savage Arms, Bushnell, BLACKHAWK!, Night Optics, all which will be directly impacted by the proposed rules changes. As requested in the proposed rule contained in Federal Register Notice, 83 FR 24166, May 24, 2018, Vista respectfully submits the following comments in the attached file "Comments on proposed rule RIN 0694AF47."

Sincerely,
Vista Outdoor Inc.

Attachments

WASHSTATEB006245

Comments on proposed rule RIN 0694AF47



July 9, 2018

Steven Clagett
Office of Nonproliferation and Controls and Treaty Compliance,
Nuclear and Missile technology Division

Bureau of Industry and Security,
U.S. Department of Commerce
14th Street and Pennsylvania Avenue, NW
Washington, DC 20230

Submitted: via Internet -- Federal eRulemaking, Docket BIS-2017-0004

RE: Comments on Proposed Rule – RIN 0694-AF47 -- Control of Firearms, Guns,
Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Dear Mr. Clagett;

Vista Outdoor Inc., (Vista) is a leading global designer, manufacturer and marketer of consumer products in the growing outdoor sports and recreation markets. We serve these markets through our diverse portfolio of well-recognized brands that provide consumers with a range of performance-driven, high-quality and innovative products, including sporting ammunition and firearms, outdoor products, outdoor cooking solutions, outdoor sports optics, hydration systems, golf rangefinders, and accessories. We serve a broad range of end consumers, including outdoor enthusiasts, hunters and recreational shooters, professional athletes, as well as law enforcement and military professionals.

The majority of Vista brands exported that require BIS or DDTC authorizations are: Federal Premium®, CCI®, Speer®; Firearms: Savage Arms™, Bushnell®, BLACKHAWK!®, Night Optics®, all which will be directly impacted by the proposed rules changes. As requested in the proposed rule contained in Federal Register Notice, 83 FR 24166, May 24, 2018, Vista respectfully submits the following comments:

Specific Comments

I. ECCN 0A501 – Firearms (except 0A502 shotguns) and related commodities as follows (See List of Items controlled)

A. Note 1 to 0A501 – Rationalize Controls Over Antique Firearms and Muzzle Loading Black Powder Firearms

The proposed note states, “Antique firearms (i.e. those manufactured before 1890) and reproductions thereof, muzzle loading black powder firearms except those designs based on centerfire weapons of a post 1937 design, BB guns, pellet rifles, paint ball and all other air rifles are EAR99 commodities.”

I. Antique Firearms

The Note defines antique firearms as “those manufactured before 1890 and reproductions thereof.” Under the current ITAR, antique firearms are controlled under USML Category I(a), however license exemption 22 CFR § 123.17(b) allows exports of “firearms covered by Category I(a) if manufactured on or **before 1898**, or replicas.” BIS’s proposed rule will require licensing of various antique rifles that are currently exported under an exemption.

Comment: We request BIS change the date in the definition of antique firearm in Note 1 from 1890 to 1898 to be consistent with the ITAR exemption.

II. 0A502 Shotguns; complete trigger mechanisms; magazines and magazine extension tubes; complete breech mechanisms; except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.

A. License Exception LVS

ECCN 0A502 does not include any list-based license exceptions. The export of, for example, 0A501 trigger or magazine would be eligible for License Exception LVS but the export of a 0A502 trigger or magazine would not. Currently the proposed rule would control low-value parts and components in 0A502 that would be eligible for LVS exports under 0A501.

Comment: To provide consistent controls and exceptions for like items please allow License Exception LVS for 0A502 parts and components proposed for 0A501 for the same types of items, such as shotgun trigger mechanisms, magazines, and magazine extensions.

Suggested modifications:

- i. Change the ECCN heading to “Shotguns and related commodities as follows (See List of Items controlled), except equipment used exclusively to treat or tranquilize animals, and except arms designed solely for signal, flare, or saluting use.”
- ii. Include in the List of Items Controlled new subparagraphs to separately list breech mechanisms, and the remaining components (e.g., “including complete trigger mechanisms; magazines and magazine extension tubes”) with a corresponding Reason for Control which allows for use of exception LVS to the same extent as proposed for 0A501.

III. 0A504 Optical sighting devices for firearms (including shotguns controlled by 0A502); and “components” as follows (see List of Items Controlled)

A. Make License Exception LVS Available for 0A504.g Items

The proposed 0A504.g (“Lenses, other optical elements and adjustment mechanisms”) does not allow for the use of License Exception LVS.

Comment: to align the availability of the exception for similarly significant items on 0A501, Vista requests that License Exception LVS be available for 0A504.g components (e.g. optical sighting device knobs), which are insignificant relative to the other items in 0A501.

IV. 0A505 Ammunition as follows (see List of Items Controlled)

A. Remove 0A018 and Transfer Controls to 0A505

As detailed in the background section of the proposed rules, BIS provides that all firearms, ammunition and related commodities will be consolidated into a new 500 or 600 series of entries and other similar items would be consolidated to the same areas on the CCL, in order to easily identify items for the exporter. Retaining 0A018 would be counter intuitive to what the essence and spirit of consolidating the like items to the same area.

Comment: We request that all commercial firearm, ammunition, and related items be in one of the series of new 500 series ECCNs (specifically the 0A505) and not left in the -018 area

B. Allow for Use of License Exception LVS

Proposed ECCN 0A505 includes license exception LVS of \$100 for subparagraph .x “parts” and “components.” The LVS exception is limited to \$100 net value per shipment related to the parts and components of ammunition listed on the CCL.

Comment: Vista requests the value of the LVS exception as it related to ammunition parts and components be raised to \$500 to match that allowed for firearm components.

V. Part 758 Export Clearance Requirements

A. Delete Proposed AES Reporting Requirements

New paragraph 758.1(g)(4) (“Exports of Firearms and Related Items”) states that “For any export of items controlled under ECCNs 0A501.a or .b, or shotguns with a barrel length less than 18 inches controlled under ECCN 0A502, in addition to any other required data for the associated EEI filing, **you must report the manufacturer, model number, caliber and serial number of the exported items.**” The explanation for the change states this is “to expand the data elements required as part of an AES filing.”

While we do understand the concern and requirement to verify firearms are exported under the correct authorization this proposed rule would be an undue burden on Vista and our U.S. industry competitors, there are already numerous mechanisms and assessment programs in place with other regulatory agencies that monitor the export of firearms, a requirement such as this would not be consistent with prior control.

Comment: We strongly request that BIS delete the new requirement for reporting the manufacturer, model number, caliber and serial number of the exported items in the AES system.

VI. Recommendation for Effective Date of Final Rule

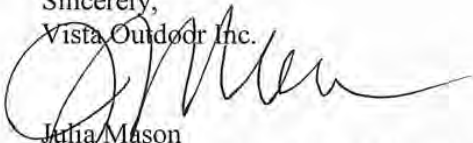
Throughout the reform effort and during transitions of items from the USML to the CCL, the final rules for other categories had an effective date of 180 days after publication.

Comment: Vista recommends a 180-day effective date for the final rule.

Thank you for the consideration and opportunity to provide comments to the proposed rules. Vista commends the joint effort among the Bureau of Industry and Security, Directorate of Defense Trade Controls, and other reviewing agencies in this endeavor and we look forward to the final rules being released.

Vista would be happy to respond to any questions or concerns, or provide additional information, please contact Julia Mason via phone (571) 343-7005 or via email at itoshootingsports@vistaoutdoor.com.

Sincerely,
Vista Outdoor Inc.



Julia Mason
Director, International Trade Operations
Vista Outdoor Inc.

PUBLIC SUBMISSION

As of: 7/12/18 10:10 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946k-lj8w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0347

Public Comment 990. Individual. Jeff Abramson. 7-9-18

Submitter Information

Name: Jeff Abramson

General Comment

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests.

Please see full comments in the attached document.

Attachments

ProposedUSMLCatItoIIICChanges_Comments_Abramson

Comments re: ITAR Amendment - Categories I II, and III; EAR Amendment - RIN 0694-AF47

Jeff Abramson

July 9, 2018

I have worked in the nonprofit sector for more than a decade in efforts to promote more responsible trade in conventional weapons and find these proposed regulatory changes to be irresponsible and dangerous. They continue the wrong-minded approach of the Trump administration to treat weapons as any other trade commodity, threatening to undermine long-term global security and true U.S. national security interests. While my comments below are as an individual concerned U.S. citizen, they are informed by my work as a senior fellow at the Arms Control Association, coordinator of a global network of professionals engaged on these issues –the Forum on the Arms Trade--, and former leader within the international Control Arms campaign that championed the creation and now implementation of the Arms Trade Treaty.

In addition to these comments, I commend to reviewers the comments by experts listed by the Forum on the Arms Trade, including: Colby Goodman, William Hartung, Christina Arabia; Adotei Akwei (on behalf of Amnesty International USA); and John Lindsay-Poland, which delve into many of these points in much greater detail.

Specific concerns include:

Loss of Congressional oversight

In 2002 Congress amended its notification threshold so that it would be informed of potential commercial sales of firearms under USML category I when they were valued at just \$1 million, as opposed to \$14 million for other major weapons sales. Such notifications have been instrumental in forestalling unwise sales, including last year to Turkey and the Philippines. No similar statutory requirement of congressional notification exists for most arms sales under the CCL, meaning Congress would lose its oversight role on these weapons.

Public reporting should be improved, not weakened

The public gains some insight into the transfer of weapons via Congressional notifications, and also through the State Department's 655 report and Blue Lantern investigations report. Those reports could provide much more detail, such as the number of specific weapons involved and other data, rather than broad categorical details (655 report). Commerce reporting provides even less data, with similar reports covering around 20 countries per year. We deserve better transparency, not worse. If this transfer of authority moves forward, the Commerce department should be required to improve its reporting.

Non-sensical to no longer consider these military weapons/defense articles

The transfer of regulatory authority to the Commerce Department is claimed to be wise because these weapons no longer "provide the United States with a critical military or intelligence advantage or, in the case of weapons, are inherently for military end use," and further because many "are widely available in retail outlets in the United States and abroad."

Applying this general approach--taken from the larger export reform initiation--falls apart when we are looking at firearms and their ammunition. These weapons are and should be controlled because a

significant amount of violence that occurs, including against U.S. military and law enforcement personnel, is inflicted by small arms. Research indicates that the types of weapons being transferred to Commerce control—AR-15s and AK-47 style assault rifles and their ammunition—are “weapons of choice” of drug trafficking organizations in Mexico and other Latin American countries. Many can also be easily converted to fully automatic weapons, which will remain under USML control. U.S. military members often operate their fully-automatic-capable weapons in a semi-automatic or less-than-automatic mode. Plus, many sniper rifles to be moved to Commerce control are in U.S. military use.

In addition, in many of the countries where these weapons are likely to be marketed, they are considered military weapons and tightly controlled. As currently proposed, they would also remain on the US Munitions Import List (USMIL), which is proper. Why they would therefore not remain on a similar export list is illogical.

Being commercially available in the United States is not a good indicator of whether these weapons merit the oversight of the State Department, which is better tasked with weighing non-commercial concerns. Nor is it proper to consider these weapons somehow safer than others on the USML.

Upsetting norms on human rights as relates to the arms trade

The United States maintains strong laws against the provision of arms where certain human rights abuses are of concern (even if we do not always live up to those laws). Some of those laws may not apply to items in the 500 series. And although the State Department will be consulted in licensing decisions, it is difficult to see how this new approach would strengthen the ability of DRL and others concerned about human rights to forcefully insert human rights into arms sales decisions.

At a time where the global community must make the arms trade more responsible, these proposed changes would make its largest arms dealer, the United States, appear less responsible and less concerned about the human rights implications of the arms trade.

Making 3-D printing easier is dangerous

It is unfathomable how allowing untraceable 3-D printing of firearms serves U.S.-recognized goals to combat illicit trafficking of firearms. Our country has agreed to support the Program of Action (PoA) on small arms and light weapons and the International Tracing Instrument (ITI), has signed accords on arms transfers and tracing in the Americas, and argued for why these efforts are so important. The United States also is the world’s largest donor, as I understand it, to helping countries build their ability to trace weapons, secure weapons stockpiles, and to destroy those stocks when warranted. Yet, this transfer of authority to Commerce appears to open the door to unfettered 3D printing, which threatens to undermine nearly all those efforts.

Overall

At a fundamental level, U.S. arms are not like any other commodity and should not be treated as such. These are first and foremost killing machines. The over-emphasis on economic security threatens to jeopardize higher priorities, including peace and security concerns. If more weapons flow to countries with poor human rights records, norms around responsible weapons use and transfer will be harder to build and uphold.

This analysis is built upon documents and comments currently available at <https://www.forumarmstrade.org/catitooiii.html>

Including:

- "[Proposed Firearms Export Changes: Key Challenges for U.S. Oversight](#)," (see also attached 14 page document), Center for International Policy, William Hartung, Colby Goodman, Christina Arabia
- Arguments against retail availability criterion ([pdf](#)), public comment by John Lindsay-Poland, Global Exchange
- "[Examples of Firearms Transferred to Commerce Under New Export Rules](#) (pdf)," Violence Policy Center, contact Kristen Rand
- "[Business with A Bang:How the Proposal to Loosen Arms Export Regulations Threatens Human Rights](#)," Nate Smith, Amnesty USA, June 15, 2018 and [Public Comment 41](#) from Adotei Akwei ([pdf](#))
- "[Trump Favors Arms Industry in Effort to Loosen Export Controls](#)," Jeff Abramson, Issue Brief, Arms Control Association, June 7, 2018.

PUBLIC SUBMISSION

As of: 7/12/18 10:04 AM Received: July 09, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-946l-cmq2 Comments Due: July 09, 2018 Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0346

Public Comment 991. Safari Club International. Anna Seidman. 7-9-18

Submitter Information

Name: Anna Seidman

Organization: Safari Club International

General Comment

See attached file(s)

Attachments

07 08 2018 - Safari Club International Comments on RIN 1400 AE30 and RIN 0694-AF47



July 9, 2018

Via <http://www.regulations.gov>

Office of Defense Trade Controls Policy
Department of State
DDTCPublicComments@state.gov

Regulatory Policy Division,
Bureau of Industry and Security,
U.S. Department of Commerce,
Room 2099B,
14th Street and Pennsylvania Avenue NW,
Washington, DC 20230.

Re: Safari Club International Comments on Proposed Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories, I, II and III, Docket RIN 1400 AE30, DOS-2017-0046; and Proposed Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML), RIN 0694-AF47, Docket No. 111227796-5786-01.

Dear Sirs:

Safari Club International (SCI) submits these comments in support of the U.S. Department of State's proposed amendments to the International Traffic in Arms Regulations (ITAR) to revise Categories I, II, and III of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. SCI also supports the Department of Commerce, Bureau of Industry and Security's proposed determination that these items no longer warrant control under the U.S. Munitions List (collectively referred to as "proposed regulations").

SCI does not support the proposed regulations' finalization and implementation of a modified procedure for the temporary export of firearms and ammunition by individuals who wish to travel outside the U.S. for recreational hunting and shooting purposes. The procedure requires travelers to use the Automated Export System (AES) to register their personal firearms and ammunition. This is an inappropriate and unworkable system for the individual who wishes to temporarily export his/her firearms. As an alternative, SCI requests that the proposed regulations be modified so that they delete the AES registration requirement and formalize and codify the Form 4457 process to ensure its consistency and use by all Customs and Border Protection (CBP) officials.

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
July 9, 2018
Page 2 of 6

Safari Club International

Safari Club International, a nonprofit IRC § 501(c)(4) corporation, has approximately 50,000 members worldwide, many of whom are U.S. residents who travel with their firearms for hunting and recreational shooting around the world. They are individuals, not businesses, who seek only to bring their own property with them when they travel and return to the U.S. with that same property. Their activities are legal and are regulated by the countries they visit to hunt and shoot.

The Origin of the AES Registration Requirement

The export of firearms is controlled under the ITAR, which is administered by the U.S. Department of State, Directorate of Defense Trade Controls (DDTC). ITAR regulations have historically included an exemption under 22 CFR §123.17(c) allowing U.S. persons to temporarily export without a license up to three nonautomatic firearms and not more than 1,000 cartridges. This exemption is widely used by hunters and other sportsmen, who travel overseas with firearms to be used for sporting and other legal purposes. To use the exemption, the U.S. person must declare the firearms and/or ammunition to CBP, carry the firearms as part of their baggage, and not transfer ownership while abroad.

In 2011, DDTC published a Federal Register notice of proposed rulemaking that principally revised the exemption related to personal protective equipment, but also included a requirement that those traveling with firearms register through the Automated Export System (AES): “The person. . . presents the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System per §123.22 of this subchapter....” 76 Fed. Reg. 16353, 163534 (Mar. 23, 2011).

The system required those registering to provide an Employer Identification Number (EIN), available only to commercial enterprises. The registration system also involved procedures far too complicated and burdensome than necessary for individuals seeking only to travel with their personal equipment. Because the registration system imposed registration obligations that would have forced hunters and shooters to make false representations to the Internal Revenue Service, jeopardized their ability to obtain permits to import the wildlife they successfully hunted, and imposed burdensome obligations unnecessary and inappropriate for non-commercial importers, CBP agreed to postpone the implementation of the registration requirements and to continue the use of Form 4457 as the mechanism to facilitate temporary firearms export. Even that solution presented problems. Due to the inconsistencies in the way that CBP personnel issued the forms, U.S. residents have encountered difficulties in taking their firearms to foreign countries (e.g. South Africa) that attribute much greater significance to Form 4457 than does the U.S.

Collection of Data Through AES Registration is Inappropriate

Without good reason, the proposed regulations would reactive the AES registration requirement for individuals seeking to temporarily export their firearms and ammunition.

Consistent with the ITAR requirements previously applicable to temporary exports of the firearms and associated ammunition covered by this rule, [Bureau

SCI Comments on Proposed Regulations Regarding Temporary Export of Firearms
July 9, 2018
Page 3 of 6

of Industry and Security (“BIS”)] is proposing to modify § 758.1 of the EAR to make clear that exporters would continue to be required to file Electronic Export Enforcement (EEI) to the Automated Export System (AES) for transactions involving such firearms and associated ammunition that are otherwise authorized pursuant to License Exception BAG.

83 Fed. Reg. 24174. The purpose of the registration system is not to facilitate the temporary export and reimport of firearms and ammunition. According to CBP, the collection of export data through the registration is designed to help with the “compilation of the U.S. position on merchandise trade” and is an “essential component of the monthly totals provided in the U.S. International Trade in Goods and Services (FT900) press release, a principal economic indicator and a primary component of the Gross Domestic Product.” <https://www.census.gov/foreign-trade/aes/aesdirect/AESDirect-User-Guide.pdf>

The government has no need to collect this data. The data, provided by individuals who wish to temporarily export and then re-import the same personally owned equipment, has nothing to do with the “U.S. position on merchandise trade” or the “Gross Domestic Product.”

The only purpose for the collection of data from individual hunters who travel with their firearms is likely to enable the government to maintain records on these individuals and their legal activities abroad. In the proposed regulations, the BIS acknowledges that the intention of the AES filing system was to “track such temporary exports of personally-owned firearms and ammunition.” SCI strongly opposes this attempt to “follow” and retain records of the individuals who travel with their firearms for hunting purposes. These individuals have taken no actions meriting the government’s desire or need to collect and maintain data on their activities. The government should remove the requirement to collect such data.

The Proposed Regulations Recognize Flaws in the Registration System

The proposed regulations provide the public with the opportunity to comment on whether CBP has been able to remedy the problems identified when CBP first attempted to activate and implement the new requirement. The drafters also condition the reactivation of the AES registration requirement on CBP’s success in remedying the problems that plagued the introduction:

Whether and how BIS includes this requirement in a final rule would be based on whether CBP is able to update its processes, and other agencies as needed, to allow for individuals to easily file EEI in AES by the time a final rule is published. If CBP is not able to do so, then the final rule may direct exporters to continue to use CBP’s existing process, which is the use of the CBP Certification of Registration Form 4457, until a workable solution is developed or CBP suggests an alternative simplified solution for gathering such information for temporary exports of personally-owned firearms and ammunition. BIS will also take into consideration any public comments submitted on this aspect of the proposed rule regarding imposing an EEI filing requirement in AES, as well as

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comments on the current practice of using the CBP Form 4457, as well as any other suggestions on alternative approaches for tracking such information.

83 Fed. Reg. 24174. AES registration should not be required as CBP has not remedied the problems that plagued the initial attempted implementation of the system.

The AES Registration System Requires Individuals to Provide False Information to the Internal Revenue Service

The AES registration system continues to require persons temporarily exporting firearms or ammunition to present “the Internal Transaction Number from submission of the Electronic Export Information in the Automated Export System.” The AES system requires an EIN before a user can submit any data. The Census Bureau administers the AES system, and their website still includes the following FAQ:

The Internal Revenue Service (IRS) site states that an Employer Identification Number (EIN) is for use in connection with business activity only. It further states, do not use your EIN in place of a Social Security Number. The information provided by the Census Bureau and the IRS is conflicting.

The IRS publication titled “Understanding Your EIN” which is located on their webpage (<http://www.irs.gov/pub/irs-pdf/p1635.pdf> [external link]) states that “...Employer Identification Number (EIN) is for use in connection with business activity only, do not use your EIN in place of a Social Security Number”.... However, for the purposes of registering or filing in the AES you can and should use your EIN. While it is not specifically stated, an EIN can be obtained for government reporting purposes when a person does not own a business.”

<https://www.census.gov/foreign-trade/regulations/ssnfaqs.html>. The Census Bureau site expressly tells individual exporters to ignore the IRS’s instructions and to misrepresent themselves as businesses, in order to obtain an EIN. The IRS site contains no instructions providing such an exception.

The Census guidelines instruct individuals to select “Sole Proprietorship” as the “type of legal structure applying for an EIN,” which is explained by IRS as: “sole proprietor includes individuals who are in business for themselves, or household employers.” The individual is further required to select “started a new business” as the reason why the sole proprietor is requesting an EIN. For an individual seeking to travel overseas with their firearms, this information is confusing, false and entered only to obtain the EIN.

As nothing has changed to remedy this problem since the AES registration requirement was originally imposed, the regulations should not include this requirement.

The AES Registration System is Designed for Commercial Operations and Is Overly Complicated for the Individual Exporter

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Despite the years that have passed since CBP's attempt to require individuals to register through the AES system for the temporary export of their firearms, the agency has not made meaningful progress in reducing the overly complicated process for registration. The system is designed for businesses whose repeated use of the system merits the time and patience required for registration. The online AES Direct Users' Guide (which contains no reference to individuals, temporary export, or firearms) is a 39-page manual that an individual would be required to learn in order to register with the system. The registration mechanism is unnecessarily burdensome and complicated for the private individual who does not wish to participate in commercial trade but merely wants to temporarily take his own firearm with him outside the U.S. for a recreational hunt or shoot.

Individuals Identifying Themselves as a Commercial Enterprise Could Jeopardize Their Ability to Import Legally Hunted Animals

The requirement that individual hunters obtain an EIN, recognized by the IRS for business purposes only, could potentially jeopardize the ability of hunters to import some sport-hunted trophies from abroad. The U.S. Fish and Wildlife Service (FWS) prohibits the importation of many sport-hunted species for commercial purposes. A hunter who registers as a business for the purpose of leaving the country and exporting the firearms he plans to use to hunt outside the United States, risks the FWS prohibiting the hunter from importing his trophies and otherwise penalizing the hunter.

The AES Registration System Does Not Replace the Use of Form 4457

As mentioned above, the proposed regulations did not intend the AES registration requirement to replace CBP Form 4457 for the temporary export and reimport of personally owned firearms. Even with the AES registration requirement, temporary exporters of firearms and ammunition will still need to obtain and complete Form 4457 and display it upon re-entry into the U.S. to prove that they did not acquire the firearms abroad. Because (1) the AES registration requirement and its purpose of tracking the activities of law-abiding hunters and recreational shooters are neither necessary nor appropriate for the temporary export activities of hunters and shooters, and (2) these individuals will continue to need to obtain and display Form 4457, the logical solution would be to abandon the AES registration requirement, retain the Form 4457 practice, and improve the mechanisms for issuing the latter.

Future Use of Form 4457 Needs to Reflect the Greater Significance of the Document Outside the U.S.

While CBP has used Form 4457 as primarily a mechanism for determining whether the firearm being imported into the U.S. is the same property the individual exported when he or she left the country, other governments attribute greater significance to the document.

South Africa, for example, treats the form as a pseudo license of a U.S. resident traveling with a firearm. South African police have conditioned import of firearms into their country on the U.S. resident's possession of what South Africa considers to be a valid Form 4457. In 2017, this led

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to problems for hunters traveling to South Africa when the CBP began issuing Form 4457s with already expired expiration dates. Although CBP explained that the agency attributes little meaning to the form's expiration date, South African officials considered the forms expired and prohibited hunters from entering the country with their firearms due to the apparent expired appearance of the forms.

The problem was exacerbated by different offices of CBP issuing different versions of the form, which also did not match the form available from CBP's website. After representatives of SCI and other organizations engaged in numerous discussions on the issue with CBP personnel, CBP adopted a temporary solution of issuing new forms with a future expiration date. CBP needs to adopt a more permanent solution that addresses the significance of the form in other countries, such as issuing forms without any expiration date.

SCI's Recommended Resolution and Revision of the Proposed Rules

SCI recommends that the drafters delete the AES registration requirement entirely for individuals and make it clear that registration is not required for those who wish to temporarily export their firearms from the United States. No tracking of the legal activities of these hunters and shooters should be conducted and no compilation of data about these individuals should be permitted. Instead, the drafters should formally codify the use of Form 4457 for individuals and should identify a single consistent standard for the form that contains no date that could be interpreted or misinterpreted by anyone as an expiration date.

Thank you for the opportunity to comment on these proposed regulations, and in particular to advocate for the removal of a process that should not be applied to individuals who wish only to temporarily export their firearms in order to engage in legal activities outside of the United States. If you have any questions or need anything further, please contact Anna Seidman, Director of Legal Advocacy Resources and International Affairs, aseidman@safariclub.org.

Sincerely,



Paul Babaz
President, Safari Club International

PUBLIC SUBMISSION

As of: 7/17/18 3:33 PM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946l-1egk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0345

Public Comment 992. Giffords Law Center to Prevent Gun Violence. Lindsay Nichols. 7-9-18

Submitter Information

Name: Lindsay Nichols

Organization: Giffords Law Center to Prevent Gun Violence

General Comment

Please see attached

Attachments

Giffords Exports Letter 7-9-18



July 9, 2018

SUBMITTED VIA FEDERAL E-RULEMAKING PORTAL

Director of Defense Trade Controls
U.S. Department of State
DDTCPublicComments@state.gov

AND
Regulatory Policy Division,
Bureau of Industry and Security,
U.S. Department of Commerce, Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

RE: Docket Nos. DOS-2017-0046, BIS-2017-0004

ITAR Amendment -- Categories I, II, and III and Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List (USML)

This comment is submitted on behalf of Giffords and Giffords Law Center ("Giffords") in response to the Proposed Rules published by the Departments of State and Commerce on May 24, 2018 regarding the classification and administration of exports of certain firearms and ammunition. The Proposed Rules are complex and would represent a dramatic change in the regulatory structure governing firearm exports. We are concerned that the Proposed Rules may not adequately address our national security, foreign policy, international crime, or terrorism threats. In sum, we are concerned about potential loss of life. We also believe the Proposed Rules do not adequately address the need for transparency so Congress and the public may understand the impact of these Rules on potential weapons exports.

Giffords is committed to advancing common-sense change that makes communities safer from gun violence. Operating out of offices in San Francisco, New York, and Washington, DC, our staff partners with lawmakers and advocates at the federal, state, and local levels to craft and enact lifesaving gun safety laws, participate in critical gun-violence-prevention litigation, and educate the public on the proven solutions that reduce gun violence.



THE PROPOSED RULES APPEAR DRIVEN BY THE INTERESTS OF THE GUN INDUSTRY

Even the National Rifle Association (NRA) admits that the Proposed Rules were drafted with "the goal of increasing U.S. manufacturers' and businesses' worldwide competitiveness." These Rules are "designed to enhance the competitiveness of American companies in the firearms and ammunition sectors," allowing firearms and ammunition "to be subject to a more business-friendly regulatory climate."¹

We are concerned that the Proposed Rules elevate the desire of American gun manufacturers to compete with international arms dealers over the danger that exported firearms will contribute to international gun crime and violence. The United States must not prioritize gun industry profits over human lives.

THE PROPOSED RULES WILL DRAMATICALLY CHANGE THE LAW, RISKING NEW LOOPHOLES

We are concerned that the Proposed Rules, by shifting firearms and ammunition from the United States Munitions List (USML) to the Commerce Control List (CCL), would weaken oversight over exports of these items. As even the NRA has acknowledged, "items on the USML controlled under ITAR are generally treated more strictly," whereas regulation under the CCL "is more flexible." The NRA has also admitted that license applications for items on the USML are subject to "more stringent vetting" than items on the CCL.²

The Departments of State and Commerce, in drafting the Proposed Rules, have made some efforts to ensure that exports of firearms and ammunition will still be subject to oversight. But the dramatic nature of the proposed changes, and the complexity of the Proposed Rules raise serious concerns about hidden loopholes. Some areas of potential concern include:

- Congressional notification and the methods for Congress to disapprove of proposed firearm exports;
- The extent to which the Commerce Department monitors the end-users of its products; and the extent to which Congress and the public have access to information about the results of this monitoring;
- The online posting of designs for the production of firearms, and their use in the 3D printing of untraceable firearms;
- Firearms training provided to foreign security forces;
- The reporting of political contributions by gun exporters and related entities;
- The Commerce Department's bandwidth to properly oversee these exports; and
- The regulation of brokers who act as middlemen in firearms transactions, and the threat that firearms will be diverted by these middlemen to violent ends.

¹ National Rifle Association, *Trump Administration's Proposed Rulemakings a Win-Win for America's Firearms Industry*, *National Security*, <https://www.nra.org/articles/20180525/trump-administration-s-proposed-rulemakings-a-win-win-for-americas-firearms-industry-national-security>

² *Ibid.*



According to the State Department's Proposed Rules, "The Department of Commerce estimates that 4,000 of the 10,000 licenses that were required by the [State] Department will be eligible for license exceptions or otherwise not require a separate license under the EAR." This statement seems to directly contradict the statement in the Commerce Department's Proposed Rules that "BIS would require licenses to export, or reexport to any country a firearm or other weapon currently on the USML that would be added to the CCL by the proposed rule." The Commerce Department later clarifies, "The other 4,000 applicants may use license exceptions under the EAR or the "no license required" designation, so these applicants would not be required to submit license applications under the EAR." While we recognize that other forms of oversight may be available, this dramatic difference in the number of licenses raises our concern.

We are also particularly concerned that these changes will result in an increase in the number of untraceable firearms in circulation. As 3D printing technology becomes more widely available, the likelihood that it may be used to construct operable firearms that are exempt from serialization requirements increases. Under current law, the proliferation of 3D printed firearms is held in check by the Fifth Circuit's decision in *Defense Distributed v. U.S. Dep't of State*,³ which upheld the State Department's decision that the posting of online data for the 3D printing of firearms fell within the USML. The Proposed Rules would throw that determination into question.

Inadequate gun safety laws cost human lives. When gun purchasers are not properly vetted and laws against gun trafficking are not properly enforced, guns often fall into the wrong hands and are used to perpetrate horrendous crimes and violence. The U.S. experiences this loss of life on a daily basis, with over 90 people killed each day. We do not wish to see a similar effect on an international level from the weakening of our laws regarding gun exports.

THIS CHANGE LACKS SUFFICIENT CONGRESSIONAL NOTIFICATION REQUIREMENTS

We have not seen anything in the Proposed Rules that would continue Congressional notification requirements for any of the Category I firearms that are being moved to the CCL. There are several types of sales controlled under the Arms Export Control Act that require Congressional notification. Under current law, a certification must be provided to Congress prior to the granting of any license or other approval for transactions involving the export of a firearm controlled under Category I of the USML in an amount of \$1 million or more.⁴ Congress then has the ability to enact a joint resolution prohibiting the export, which would prevent the State Department from licensing the sale. Congress generally is given 15 days or 30 days to review the transaction before a license can be granted, depending on the items being exported and the

³ 838 F.3d 451 (5th Cir. 2016).

⁴ See 22 U.S.C. § 2776, 22 C.F.R. 123.15(a)(3).



country to which it is being exported. While there are Congressional notification requirements for certain products that are controlled under the CCL, it seems that such notification requirements would not be as broad that as under the USML.

Congress should continue to receive advance notification of transactions involving firearms and to have the opportunity to prohibit these exports when appropriate. The Proposed Rules should be strengthened to protect Congress's authority in this area.

THE CHANGE MAY RESULT IN LESS TRANSPARENT END-USE MONITORING

We are concerned about a possible reduction in the monitoring of the end-users of exported firearms and publicly available information about this monitoring. The State Department currently monitors the end-users of firearm exports through its Blue Lantern program. Public reporting of Blue Lantern information is mandatory⁵ and there are readily available statistics about the results. While the Commerce Department also conducts end use monitoring, there does not appear to be as fulsome a public reporting requirement for these end use checks as under the Blue Lantern program.

The Proposed Rules do not discuss end use monitoring of the items being moved to the CCL. It is reasonable to assume that these items will fall under the general Bureau of Industry and Security end use check program. This end use check program is not as well-publicized or as formal as the Blue Lantern program, and only a very small percentage of exported items are reviewed. If the Proposed Rules move forward, this program must be strengthened to address the need to monitor the end-users of exported firearms and provide the public with information about the results.

THIS CHANGE IGNORES THE MILITARY NATURE OF MANY FIREARMS

The Proposed Rules are based on an assumption that automatic firearms are designed for and used by the military, and semiautomatic firearms are not "inherently military." This is inaccurate. Consequently, we question the President's determination that semiautomatic firearms and ammunition no longer warrant control under the USML.

In fact, members of the U.S. armed forces routinely use firearms in semiautomatic mode in combat conditions, and the designs of many semiautomatic firearms are inherently military. Assault rifles like the AR-15 were originally designed for military use. Earlier models included a selective fire option that allowed service members to switch easily between automatic and semiautomatic modes. The military included the option to fire in semiautomatic mode because military combat sometimes requires use of a firearm in

⁵ 22 U.S.C. §§ 2785, 2394, 2394-1a



semiautomatic mode. Shooting in semiautomatic mode is more accurate and hence more lethal.⁶ In fact, some members of the military use the semiautomatic mode exclusively.

The fact that some gun enthusiasts “enjoy” shooting these weapons and have labeled this activity “modern sport shooting” or “tactical shooting” does not change the design or purpose of these firearms or the danger they pose in civilian hands. The horrendous rise in mass shootings our country has suffered and the frequency with which these firearms are used in these shootings testify to this danger.

Military-style semiautomatic firearms were used to perpetrate the tragedies that occurred in an elementary school in Newtown, Connecticut, at a music festival in Las Vegas, Nevada, at a workplace in San Bernardino, California, in a movie theatre in Aurora, Colorado, and at a high school in Parkland, Florida, among others. Because of the dangerous nature of these weapons, D.C. and seven states, including the populous states of California and New York, ban them.⁷ Because of the military nature and serious lethality of these weapons; they belong on the USML.

THERE ARE ALTERNATIVES TO THE PROPOSED RULES THAT HAVE NOT BEEN EXPLORED

The real concern that seems to be driving this significant change in the way the U.S. government regulates firearms exports is that firearms and ammunition manufacturers are currently required to register with the State Department and pay a registration fee. According to the NRA, “Any business that manufactures an item on the USML, or even just a part or component of such an item, also has to register with the State Department and pay an annual fee, which is currently set at \$2,250. This registration is required even if the manufacturer has no intent to ever export the items. ... Manufacturers of items on the CCL, or their parts or components, do not have to pay an annual registration fee to the Commerce Department.”⁸

The registration fee appears to be the NRA’s primary concern with the current system for regulating the export of firearms and ammunition. The simple solution to this problem might be to waive the fee for manufacturers who do not, in reality, export these items. Waiving the fee would relieve industry of this “burden” without undoing the important policy choices made by the State Department in the regulation of these exports or requiring the Commerce Department to “reinvent the wheel” with respect to these regulations. While we would not necessarily support this proposal (it might shift the costs of manufacturer

⁶With AR-15s, Mass Shooters Attack With the Rifle Firepower Typically Used by Infantry Troops, NY Times, Feb. 28, 2018, <https://www.nytimes.com/interactive/2018/02/28/us/ar-15-rifle-mass-shootings.html>.

⁷ See Giffords Law Center to Prevent Gun Violence, *Assault Weapons* at <http://lawcenter.giffords.org/gun-laws/policy-areas/hardware-ammunition/assault-weapons/>.

⁸ National Rifle Association, *supra*.



registration to the taxpayers), we urge the Administration to carefully and thoroughly consider other alternatives to the Proposed Rules.

Sincerely,

A handwritten signature in black ink that reads "Lindsay Nichols". The signature is written in a cursive, flowing style.

Lindsay Nichols
Giffords Federal Policy Director

ABOUT GIFFORDS LAW CENTER

For nearly 25 years, the legal experts at Giffords Law Center to Prevent Gun Violence have been fighting for a safer America by researching, drafting, and defending the laws, policies, and programs proven to save lives from gun violence.

PUBLIC SUBMISSION

As of: 7/12/18 9:51 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946m-5enx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0343

Public Comment 993. Individual. Jeannine Coyne. 7-9-18

Submitter Information

Name: jeannine anonymous

General Comment

To Whom It May Concern,

I am writing to strongly oppose Pres. Trump's May 24, 2018 proposal of a new rule that would move the oversight of the export of firearms from the US State Dept to the US Commerce Dept. This is a matter of national security and appropriately is the role of the US State Dept. While this move might raise more money for particular businesses, it would increase the threat of international crime and terrorist crimes. I further oppose the loosening of regulations that keep Americans safe and prevent guns getting into the hands of terrorists.

Respectfully submitted,

Jeannine Coyne

PUBLIC SUBMISSION

As of: 7/12/18 9:47 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946m-w8wy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0341

Public Comment 994. Northrop Grumman. Tom Donovan. 7-9-18

Submitter Information

Name: Tom Donovan

General Comment

See attached file(s)

Attachments

RIN 0694-AF47 Comments to DOC for I II III (final)



Northrop Grumman Corporation
Corporate Office

Global Trade Management
2980 Fairview Park Drive
Falls Church, VA 22042

July 9, 2018

Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B, 14th Street and Pennsylvania Avenue, NW
Washington, DC 20230

ATTN: Mr. Richard E. Ashooh
Assistant Secretary for Export Administration

SUBJECT: RIN 0694-AF47, Request for Comments Regarding Control of Firearms, Guns, Ammunition and Related Articles the President Determines No longer Warrant Control Under the United States Munitions List.

Dear Mr. Ashooh:

Northrop Grumman Corporation wishes to thank the Department of Commerce (DOC) for the opportunity to submit comments in review of the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). In response, we provide the following recommendations:

General: We recommend the DOC define “firearm” in harmonization with the USML.

EAR §740.11 – Governments, international organizations, international inspections, under the Chemical Weapons Convention, and the International Space Station (GOV):

Note 2 to paragraph (b)(2) – the phrase “or other sensitive end-users” is vague and ambiguous. We recommend deletion or enumeration of specific types of entities ineligible for the exception.

EAR §740.14 – Baggage (BAG):

§740.14(c)(1) – Recommend revising to say “Owned by, or for the exclusive use of, the individuals (or by members of their immediate families) or by crew members of exporting carriers on the dates they depart from the United States;”

- EAR §740.1(c)(1) “Limits on eligibility” currently states that the items must be “owned by” the individuals. The criteria currently in the exemption located in ITAR §123.17(c)(3) is related to the person’s “exclusive use,” so we recommend revising the language in EAR §740.14(c)(1) so the exception may not be interpreted as being more restrictive than the current ITAR exemption criteria.

ECCN 0A501:

To avoid redundancy and duplication, we recommend revising the LVS entry as follows: “LVS: \$500 for 0A501.c, .d, and .x, \$500 for 0A501.e if the ultimate destination is Canada.”

Paragraph 0A501.x: As currently proposed, paragraph .x would apply to parts, components, accessories, and attachments specifically designed for a commodity classified anywhere on the USML. We recommend revising as follows:

“Parts” and “components” that are “specially designed” for a commodity classified under paragraphs .a through .c of this entry or USML Category I and not elsewhere specified on the USML or CCL.

ECCN 0A502: Rather than having the items controlled contained in the ECCN heading, we recommend enumerating separate sub paragraphs for the different reasons for control for size for the different size shotguns. Breaking down to this lower level will allow companies to record much easier the classification in an automated system and apply proper controls without having to continually reference back to technical data or notes.

- .a Shotguns with a barrel length less than 18 inches
- .b Shotguns with a barrel length 18 inches to less than 24 inches
- .c Shotguns with a barrel length greater than or equal to 24 inches
- .d Complete trigger mechanisms; magazines and magazine extension tubes; complete breech mechanisms;

Note: this entry does not control equipment used exclusively to treat or tranquilize animals, and arms designed solely for signal, flare, or saluting use

ECCN 0A505:

Paragraph 0A505.a: Recommend revising paragraph .a to include ammunition for firearms controlled in USML Category I that may not otherwise be captured, as follows:

Ammunition for firearms controlled by ECCN 0A501 or USML Category I and not enumerated in paragraph .b, .c, or .d of this entry or in USML Category III.

Paragraph 0A505.d: Recommend adding clarifying language to this paragraph on whether it also controls “dummy rounds” for medium caliber firearms as it only references “blank ammunition” for small caliber firearms. If this is not intended to control inert dummy ammunition please clarify this category to include that.

0A505 Related Controls: Recommend deleting “combat shotguns.” The proposed revision to USML Category I only covers fully automatic shotguns, which is already referenced in the “Related Controls” section.

ECCN 0B602: Recommend adding clarifying language on examples of specific tooling that have been included in the transfer from the Department of State to the Department of Commerce or, clarifying this in the final rule. For example, provide clarification by including a note stating that this includes boresights and units made specifically for testing purposes.

Administrative: We recommend adopting a delayed effective date of 180 days for rules revising entire categories of the USML and moving items to the CCL.

Should clarification or subsequent technical discussions be necessary, please contact either Steve Headley at james.headley@ngc.com, (703-280-4806), or myself at thomas.p.donovan@ngc.com (703-280-4045).

Sincerely,

Thomas P. Donovan

Thomas P. Donovan
Director, Export Management
Global Trade Management

PUBLIC SUBMISSION

As of: 7/12/18 5:06 PM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946q-i32v
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0334

Public Comment 995. Trinity Health. Tonya Wells. 7-9-18

Submitter Information

Name: Tonya Wells

Organization: Trinity Health

General Comment

See attached

Attachments

TH comments on transfer of firearms from State to Commerce 7-9-18



July 9, 2018

Wilbur Ross
Secretary
Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
1401 Constitution Avenue NW
Washington, DC 20230

Mike Pompeo
Secretary
Office of Defense Trade Controls Policy
Directorate of Defense Trade Controls
U.S. Department of State
2201 C Street NW
Washington, D.C. 20520

RE: RIN 0694-AF47 (Commerce) and RIN 1400-AE30 (State)

Dear Mr. Ross and Mr. Pompeo,

Trinity Health values the opportunity to comment on the proposed rules to address the Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML). Trinity Health is one of the largest multi-institutional Catholic health care delivery systems in the nation, serving diverse communities that include more than 30 million people across 22 states. Trinity Health includes 93 hospitals as well as 109 continuing care locations that include PACE, senior living facilities, and home care and hospice services. We are called by our Catholic faith to preserve the sanctity of life, and are working to reduce violence in our communities and around the world.

The proposed rule referenced above addresses many aspects of firearm regulation, sales and oversight, however Trinity Health is especially concerned about the shift of weapon sale regulation from the State Department to the Commerce Department. Our concern stems from the risk we perceive about how this regulatory change could increase the amount of violence caused by weapons around the world. All forms of firearms are used extensively in criminal violence around the world. We believe the world is better served by their export being handled by the State Department, which is required and organized to consider the probable impacts in importing nations on stability, human security, conflict, and human rights. We have great concern about the proposed transfer of the regulation of gun exportation licensing from the State department to the Commerce Department, whose principle mission is to stimulate trade.

Every day around the world firearms are used to kill a thousand people in acts of organized crime, political violence, terrorism, and human rights violations. The proposed rule would transfer the regulation around the sale of weapons – including AR-15, AK-47 and other military-style assault rifles and their ammunition – to the Commerce Department control. These are among the deadliest personal-use weapons produced in the United States, and it is our understanding that they are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries. We believe that the export of these weapons should be subject to greater regulation, not less.

We believe that the Department of Commerce is effective at advancing the interests and revenues of private businesses in our country, which contributes to a strong economy. However, we believe that firearms and ammunitions should be be viewed as a commodity that should benefit from reduced regulatory oversight. Boosting economic development and competitive advantage at the expense of increased violence including loss of life is

unconscionable to us. We strongly urge the Departments of Commerce and State to rescind this proposed rule.

Thank you for consideration of our comments on this important issue. If you have any questions, please feel free to contact me at wellstk@trinity-health.org or 734-343-0824.

Sincerely,

A handwritten signature in cursive script that reads "Tonya K. Wells". The signature is written in dark ink and is contained within a rectangular box.

Tonya K. Wells
Vice President, Public Policy & Federal Advocacy
Trinity Health

PUBLIC SUBMISSION

As of: 7/12/18 4:59 PM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946q-6b3d
Comments Due: July 09, 2018
Submission Type: API

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0332

Public Comment 996. F.A.I.R. Trade Group. Johanna Reeves.7-9-18

Submitter Information

Name: Anonymous Anonymous

Address:

1775 I STREET, NW

SUITE 1150

Washington, DC, 20006

Email: execdir@fairtradegroup.org

Phone: 2025872709

Organization: F.A.I.R. TRADE GROUP

General Comment

F.A.I.R. Trade Group respectfully submits the attached comments to RIN 0694-AF47.

Attachments

F.A.I.R. Trade Group Comment to BIS Proposed Rule (RIN 0694-AF47)



F.A.I.R.

Firearms & Ammunition Import/Export Roundtable

July 9, 2018

Attn: Steven Clagett
Office of Nonproliferation Controls and Treaty Compliance
Nuclear and Missile Technology Controls Division

Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce, Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230.

Subject: RIN 0694-AF47; Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Dear Mr. Clagett:

The purpose of this letter is to provide comments to the proposed rule to amend the *Export Administration Regulations* (EAR) to control those items identified to no longer warrant control under United States Munitions List (USML) Category I - Firearms, Close Assault Weapons and Combat Shotguns; Category II - Guns and Armament; and Category III - Ammunition/Ordnance U.S. Munitions List (USML), which the Bureau of Industry and Security (BIS) published in the *Federal Register* on May 24, 2018 (RIN 0694-AF47; 83 FR 24166).

The F.A.I.R. Trade Group ("F.A.I.R.") is a nonprofit organization dedicated to protecting the interests of the firearms and ammunition import and export communities. F.A.I.R. works with many U.S. government agencies, including the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), the U.S. Department of State, Directorate of Defense Trade Controls (DDTC), and the Department of Commerce, Bureau of Industry and Security (BIS) to provide solutions to the concerns of F.A.I.R. members. Our membership includes importers and exporters of firearms, ammunition, and other defense and dual-use articles who rely on licenses issued by ATF, DDTC, and BIS. Many members also hold Type 07 or Type 10 licenses as manufacturers of firearms. Members provide equipment to domestic law enforcement agencies and the U.S. military who require such items to carry out their public safety and national security missions and sell the articles they import to distributors for general commercial sale. A number of our members also produce firearms and ammunition that are exported to foreign governments for their national defense, consistent with the foreign policy of the United States.

F.A.I.R. welcomes the opportunity to provide comment on the proposed revisions to the EAR to capture those items moving from USML Categories I, II, and III. We applaud the continuing efforts by BIS and DDTC to revise the USML so that its scope is limited to those defense articles that

1775 I STREET, N.W., SUITE 1150, WASHINGTON, DC 20006

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provide the United States with a critical military or intelligence advantage or are inherently for military end use, and to remove those items that are widely available in retail outlets in the United States and abroad.

Overall, the proposed revisions to the EAR and USML Categories I, II, and III are a positive move to a more rational control of firearms and ammunition, and related parts, components, accessories, and attachments. The transition of certain items to the control of the EAR will serve to right-size license requirements while still maintaining necessary oversight of exports of these items. Additionally, by moving such items to the EAR, many domestic manufacturers who do not conduct exports will be relieved of the significant financial burden of registering under the ITAR.

We provide the following comments for BIS consideration, and are available should BIS or DDTC require additional information or wish to discuss our comments further:

1. **Implementation Period.**

As noted in the proposed rule, BIS has adopted a delayed effective date of 180 days for previous rules revising entire categories of the USML and moving items to the CCL. BIS has requested comments from industry as to whether this implementation period should be applied to the revised Categories I, II, and III.

Recommendation: Split implementation period. We wish to support the continued delayed effective date of 180 days for those industry members who need make changes to IT systems, technology controls plans, and other business processes necessary to implement the rule. However, there will be a number of domestic companies who, for example, do not engage in the business of exporting but engage in certain gunsmith activities or manufacture firearms parts and components for firearms that transition to the EAR who will wish to immediately implement the new rules in order to be relieved of the financial burden of ITAR registration. Therefore, we recommend DDTC allow for a split implementation period to allow those companies whose entire operations transition to the EAR to immediately shift to those controls while allowing those companies whose operations either remain under the ITAR or are now split between the EAR and the ITAR adequate time to make necessary changes to their businesses. There is precedent for a split implementation period as it was done in the *Federal Register* notice implementing of revisions to USML Category XI and corrections to USML Category VIII (See 79 FR 37536).

2. **Transition Firearm Suppressors (Silencers) to the CCL.**

DDTC's proposed rule indicates that "[USML Category I] Paragraph (e) will continue to cover silencers, mufflers, sound suppressors, and specially designed parts and components." The proposed rule further indicates that its objective, after the proposed revisions, is to capture only those articles in USML Categories I, II, and III that provide the United States with a critical military or intelligence advantage, or are inherently for military end use. The items proposed for transition to the EAR do not meet this standard, "including many items which *are widely available in retail outlets in the United States and abroad* [emphasis

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added].” Firearm suppressors (silencers) do not provide a critical military or intelligence advantage and are not inherently for military end use. Moreover, the hardware and associated technology is widely available throughout the world. Therefore, based on the litmus test identified in the proposed rule, firearm suppressors (silencers) should not be listed on the USML and should be more appropriately controlled on the CCL in the EAR.

Recommendation: Remove Firearm suppressors (silencers) from USML Category I(e) and add them as a controlled item under ECCN 0A501.

3. **Use of “Combat Shotguns”.**

DDTC proposes to revise USML Category I(d) to read as follows: “*(d) Fully automatic shotguns regardless of gauge.” This proposed revision removes the words “combat shotguns.” While we welcome this change due to the long-standing confusion over this undefined term, the words “combat shogun” are used in the proposed revisions to the EAR, specifically in the Related Controls of proposed ECCN 0A502, which reads: “This entry does not control *combat shotguns* [emphasis added] and fully automatic shotguns. Those shotguns are “subject to the ITAR.” The Related Control to ECCN 0A502 does not go on to provide a definition for “combat shotgun.” The lack of definition and the removal of the reference in the revised USML Category I(d) causes confusion as to what type of firearm is being referenced.

Recommendation: Remove the reference to “combat shotguns” in ECCN 0A506 and have the Related Control to reflect the language used in the ITAR. The Related Control would read as follows: “*This entry does not control fully automatic shotguns regardless of gauge. Those shotguns are “subject to the ITAR.”*”

4. **Automated Export System.**

Currently, when exporting firearms, there is no requirement to enter serial numbers of firearms to be exported into the Automated Export System (AES). However, in the BIS proposed rule, there is a proposal to expand the data elements required as part of an AES filing for these items to include serial numbers, make, model and caliber. This requirement is overly burdensome and will exponentially lengthen the time required for filing AES entries. Contrary to the proposed rule, this is not a mere “carrying over” of existing CBP filing requirements for items transferred from the USML to the CCL. The cited reference to information Department of Homeland Security currently collects under OMB Control Number 1651-0010 (CBP Form 4457, Certificate of Registration for Personal Effects Taken Abroad) applies only to personal firearms temporarily exported. However, the proposed rule would apply to all exports of items controlled under ECCN 0A501.a or .b and shotguns with a barrel length less than 18 inches controlled under ECCN 0A502. Consequently, there is a significant change to the information being collected and to the burden hours as a result of this proposed rule.

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Recommendation: Remove the expansion of data elements required as part of an AES filing for firearms. The serial numbers, make, model and caliber of firearms exported, as well as the reference to the export vehicle (e.g., export license, exception) will be maintained by the exporter as part of its acquisition and disposition records required under the Gun Control Act and ATF regulations (27 C.F.R. Pt. 478, Subpart H), which are the same records currently maintained for firearm exports subject to the ITAR. Therefore, there is no loss of oversight or information by transitioning these items to the EAR and thus no need for adding data fields to AES entries. This is not required under the ITAR, and therefore should not now be required under the EAR.

5. **ECCN 0A501**

The BIS proposed rule states in “*Related Controls*” that magazines with a capacity of 50 rounds or greater are “subject to the ITAR.” However, the proposed USML Category I(h)(1) references only magazines and drums with a capacity *greater than* 50 rounds (emphasis added).

Recommendation: Revise ECCN 0501 “*Related Controls*” so that the capacity round description is consistently with USML Cat. I(h)(1).

6. **ECCN 0A501.d.**

This paragraph includes a reference to “complete breech mechanisms” with no further explanation or note to define the terms. It is unclear what would constitute a complete breech mechanism that is distinct from other parts specifically identified in paragraph .c.

Recommendation: Revise ECCN 0A501 .d to include a definition or explanation of what constitutes a “complete breech mechanism,” and to ensure there is no redundancy with any of the parts referenced in paragraph .c.

7. **ECCN 0A501.y.**

The proposed rule explains this paragraph would cover such items as scope mounts or accessory rails, iron sights, sling swivels, butt plates, recoil pads, bayonets, and stocks or grips that do not contain any fire control “parts” or “components.” The paragraph indeed lists such items in specifically enumerated subparagraphs .y.1 - .6. Does this mean the .y paragraph controls only those items enumerated in the following subparagraphs .1-.6, or does the umbrella language in .y. serve to capture other parts, components, or attachments that are not specifically enumerated in subparagraphs .y.1 - .6., and not elsewhere specified (such as magazines for less than 16 rounds) ? In other words, does the .y. paragraph itself serve as a catch-all for “parts”, “components”, “accessories” and “attachments”?

Recommendation: Revise paragraph .y by replacing the period at the end of the paragraph with the phrase “including” or “as follows:” so as to clarify whether .y is limited to the enumerated subparagraphs, or itself is a control paragraph in which

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items can be controlled. 0A501.y would read as follows: *“Specific ‘parts,’ ‘components,’ ‘accessories’ and ‘attachments’ ‘specially designed’ for a commodity subject to control in this ECCN or common to a defense article in USML Category I and not elsewhere specified in the USML or CCL, as follows [or including]:”*

8. **ECCN 0A502.**

The proposed rule states that this ECCN would control both the shotguns currently on the USML that are to be added to the CCL (barrel length less than 18 inches) and the shotguns and the enumerated “parts” and “components” currently controlled in ECCN 0A984 (barrel length 18 inches or greater). However, the items included in the ECCN header are separated by semicolons and there is no clear statement that the parts and components listed in the header are specific to shotguns. For example, because it is not clear that the enumerated items are specific to shotguns, there could be confusion as to whether 10 round magazines are controlled in ECCN 0A502, ECCN 0A501.y., or would such items fall to EAR99?

Recommendation: Revise ECCN 0A502 to specify the parts and components enumerated in the ECCN header are SHOTGUN parts and components. We also recommend defining or explaining what constitutes “complete breech mechanism” (see comment for ECCN 0A501.d above).

9. **ECCN 0A505.**

The proposed rule states that ammunition parts and components would be eligible for license exception LVS with a limit of \$100 net value per shipment. This is a reduction in value compared to the ITAR license exemption currently available under 22 C.F.R. § 123.16(b)(2), which is capped at \$500. It is unclear why the transition to the EAR would result in a reduction in the license exception value limit.

Recommendation: Revise ECCN 0A505 to increase the value limit for the LVS license exception for ammunition parts and components in paragraph .x to \$500.

10. **ECCN 0A606.**

The DDTC proposed rule states that “the articles currently controlled in [Category II] paragraph (f), engines for self-propelled guns and howitzers in paragraph (a), will be on the CCL in ECCN 0A606.” However, there are no proposed corresponding changes to ECCN 0A606 in the BIS proposed rule.

Recommendation: Revise ECCN 0A606 to clearly identify that engines for self-propelled guns and howitzers are controlled therein.

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11. **§ 758.10 Entry clearance requirements for temporary imports.**

The proposed rule fails to take into consideration temporary imports by nonresident aliens who are subject to ATF regulations under 27 C.F.R. § 478.115(d). Although the license exception BAG references ATF's jurisdiction with these types of imports, proposed section 758.10 is silent, except for ATF's regulation of *permanent imports* (paragraph (2)).

Recommendation: Add language to 758.10(a)(2) carving out from the entry clearance requirements for temporary imports by nonresident aliens who temporarily import firearms under the provisions of 27 C.F.R. § 478.115(d).

12. **§ 762.2 Records to be retained.**

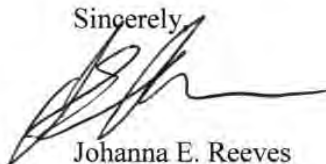
The proposed rule indicates that BIS wishes to make changes to EAR recordkeeping requirements for firearms being moved to the CCL. Specifically, BIS proposes to "add a new paragraph (a)(11) to specify the following information must be kept as an EAR record: Serial number, make, model, and caliber for any firearm controlled in ECCN 0A501.a and for shotguns with barrel length less than 18 inches controlled in 0A502." This additional recordkeeping requirement is unnecessary as it is duplicative of the information that is required to be retained in a company's ATF bound books pursuant to the Gun Control Act and ATF regulations. In other words, the information that BIS seeks to retain is already being maintained by companies under ATF rules and regulations.

Recommendation: Remove the proposal to add paragraph (a)(11).

* * * * *

F.A.I.R. thanks the Departments of State and Commerce for the opportunity to participate in the regulatory revision process. We hope that our comments assist the government in reducing jurisdictional ambiguities and clarifying the articles that will remain subject to the ITAR. For your information, we also provide a copy of the comments submitted in response to the DDTC proposed rule. Should you have any questions, or require additional information as you review public comments received, please do not hesitate to contact me at 202-587-2709 or execdir@fairtradegroup.org.

Sincerely



Johanna E. Reeves
Executive Director

Enclosure: Comments to DDTC Proposed Rule (RIN 1400-AE30)

PUBLIC SUBMISSION

As of: 7/12/18 9:18 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946q-ts88
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0331

Public Comment 997. Anonymous. 7-9-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change. I'm very concerned that it will lead to greater accessibility of guns for people who shouldn't have them. No more loss of human life PLEASE!

PUBLIC SUBMISSION

As of: 7/12/18 9:15 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946r-x68w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0330

Public Comment 998. Individual. Jennifer Wall. 7-9-18

Submitter Information

Name: Jennifer Wall

Address:

Maryville, MO,

General Comment

Firearms are a matter of security not of commerce. Let the state department handle matters of security and the sales of firearms rather than transferring that oversight to commerce.

On May 24, the Trump Administration formally proposed a new rule that would loosen regulations over gun exports, potentially increasing the risk that dangerous weapons may end up in the hands of international criminals. The proposed rule would dramatically change the regulatory structure for firearm exports. The proposed rule is complex and appears to be largely driven by the interests of industry. We are concerned that the proposed rule may not adequately address our national security, foreign policy, international crime, terrorist threats, or the need for transparency so Congress and the public may understand the impact of these rules and potential firearm exports. We are also concerned that the proposed rule fails to recognize the inherently military nature of many of the relevant firearms. Rather than moving forward with the proposed rule, the Administration should consider other alternatives to better balance the important interests at stake.

PUBLIC SUBMISSION

As of: 7/12/18 9:12 AM Received: July 09, 2018 Status: Posted Posted: July 12, 2018 Tracking No. 1k2-946r-wvlv Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0327

Public Comment 999. Borderview. J VanderHoek.7-9-18

Submitter Information

Name: Joel VanderHoek

Organization: BORDERVIEW International Firearm Logistics

General Comment

BORDERVIEW appreciates the opportunity to comment on the long-awaited transition of firearms and related items from the jurisdiction of the Department of State to the Department of Commerce. Please see attached for our public submission.

Attachments

Borderview comments on BIS Proposed Rule



July 9, 2018

Submitted at www.regulations.gov – Docket BIS-2017-0004, and by Email: steven.clagett@bis.doc.gov

Mr. Clagett et. al.,

BORDERVIEW appreciates the opportunity to comment on the long-awaited transition of firearms and related items from the jurisdiction of the Department of State to the Department of Commerce. We have closely followed the efforts since the early days of the Obama administration to complete this phase of Export Control Reform, and applaud the publishing of these proposed rules.

Broadly speaking, we are very supportive of the proposal and would like to underscore the well-laid justifications made in the 'Background' section of the proposed rule, and furthermore in the related ['Myths vs. Facts' release](#) posted on the Department of Commerce website. BORDERVIEW looks forward your publishing of the Final Rule and completion of these longstanding and bipartisan efforts to simply our nation's export control infrastructure to better control the most military-sensitive items, while maintaining appropriate controls on Dual Use items such as firearms.

After careful review of the Proposed Rules, we offer the following comments and recommendations. In particular, we are most concerned about a number of facets of the proposed rule which add new and additional burden, above and beyond that which has historically been imposed by the ITAR and without proportionate benefit to industry or government. We will identify which comments below are as such.

1. Eliminate Proposed § 758.1(g)(4) – Expanded Data Elements for EEI filing in AES.

The proposed rules would add required AES data elements of "manufacturer, model number, caliber and serial number" for all exported firearms (to proposed § 758.1(g)(4)). Perhaps most concerning to us as a leading international firearm logistics firm are these burdensome, redundant and unnecessary additional data collection requirements. While it may seem like a relatively simple requirement, we see several problems with imposing this new data collection, and little if any benefit over the existing requirements, particularly with respect to serial number reporting.

First, this adds a new and significant burden over the longstanding requirements, and one which would require exporters to invest significant time and financial resources in re-programming software and AES interfaces, or in repeated and cumbersome manual data entry. Rather than “reducing the procedural burdens and costs of export compliance” as is the stated intent of the proposed rule, this new requirement is one that does just the opposite. As we’ll explain below, we believe this new burden is imposed *without* providing any real improvement in the U.S. Government’s ability “to enforce export controls for firearms appropriately” or “to make better use of its export control resources.”

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The explanation given for this new requirement in the Proposed Rule is that the "requirement would ensure law enforcement officials are able to effectively verify that firearms exports are properly authorized and in conformance with all applicable regulations." However, as explained below, we believe this change would affect no substantive improvement in this regard.

Serial Number data element in EEI filing in AES

Serial numbers are generally *not* listed on an export license issued by BIS (except in the rare case they are entered by the applicant at the time of application, which is not required and would be unusual). Therefore, the presence of serial numbers in an AES filing would not assist law enforcement in verifying that items being exported on a given shipment match the items on the related export license. For example, an AES filing noting a Serial Number of "ABC123XYZ" for a given rifle would provide no assistance in matching that particular rifle to the associated export license which does not list the serial number. Furthermore, it should be noted that attempting to address this reality by requiring firearm serial numbers to be listed on export license applications would contradict the very nature of the BIS licensing philosophy – allowing commodity-based predictive license quantities for use over a set time.

Another concern about the mandated electronic collection of serial number data for exported firearms is that it would amount to a de facto electronic government Registry of all exported firearms. Congress has, for many years and in many forms, prohibited the creation of a federal firearms registry. Specifically, the Firearms Owners Protection Act codified this intent of Congress in 18 U.S.C. § 926(a)(3), which states:

“No such rule or regulation prescribed after the date of the enactment of the Firearms Owners Protection Act may require that records required to be maintained under this chapter or any portion of the contents of such records, be recorded at or transferred to a facility owned, managed, or controlled by the United States or any State or any political subdivision thereof, nor that any system of registration of firearms, firearms owners, or firearms transactions or disposition be established. Nothing in this section expands or restricts the Secretary's authority to inquire into the disposition of any firearm in the course of a criminal investigation.”

To the extent that such a registry may aid law enforcement in the necessary function of tracing firearms, it should be noted that an effective system already exists through the ATF's National Tracing Center (NTC). The NTC relies primarily on the required records kept by Federal Firearms Licensees (FFLs), which already include the data elements of manufacturer, model designation, caliber and serial number, among others. As all U.S. commercial firearm exporters would be FFLs, this data is already kept in a proven system. To require it separately here would be unnecessarily duplicative and burdensome, without additional benefit.

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Other additional data elements in AES (manufacturer, model number, caliber)

Existing regulations in both the FTR and EAR already require that the item description entered in the AES filing conforms to that shown on the license. Thus, the explicit addition of required data elements of "manufacturer, model number (and) caliber" would provide no further to ability for law enforcement to "effectively verify that firearms exports are properly authorized."

The Foreign Trade Regulations state for 'Commodity description', "If the shipment requires a license, the description reported in the EEI shall conform with that shown on the license." (15 CFR 30.6(a)(13))

The Export Administration Regulations state for 'Exports under a license', "...you must report on the EEI filing to the AES...an item description identical to the item description on the license." (15 CFR 758.1(g)(1))

Therefore, adding new required data elements would be unnecessarily duplicative and burdensome. Exporters are already required to enter data into AES in such a way that it can be matched to the export license by law enforcement verifying a shipment. If there has been a problem with exporters not doing this in the past and thus impeding law enforcement verification, it would be best addressed by educating on and enforcing the existing requirements of the FTR and EAR, rather than adding a new and duplicative information collection requirement specific only to firearms.

Furthermore, like serial numbers, all of these proposed data elements are already kept by Federal Firearms Licensees under the provisions of the Gun Control Act (GCA), and are accessible to law enforcement as needed.

Finally, if after consideration of our comments herein BIS decides to proceed with proposed § 758.1(g)(4) to include model, the wording "model number" should be changed to simply "model", or "model designation (if assigned)" instead. Only a fraction of firearm models are "numbers", while many others are names, and some do not have model designations assigned at all. ATF recognizes this in their Regulations which refer simply to "model", or in some cases "Model Designation (if assigned)."

CBP changes to AES as requested by BIS

The proposed rule notes that such a proposed requirement would only be included in the final rule "if CBP has made such data easily enterable in AES." As explained above, multiple regulations already require the data to be entered in such a manner that law enforcement can match it to the export license.

Yet, if BIS can work with CBP to affect one needed change to the AES, we would suggest allowing a much higher number of characters in the 'Commodity Description' field, which is currently limited to 45. This character count limit is likely a driving factor in any past verification issues experienced which may have compelled BIS to propose adding new data elements.

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Exporters are already required to report all of the following within the 45-character 'Commodity Description' field for licensed items:

- "item description must be stated in Commerce Control List (CCL) terms" (15 CFR 758.1(g));
- "fully state the name of the commodity in terms that can be identified or associated with the language used in Schedule B or HTSUSA (usually the commercial name of the commodity), and any and all characteristics of the commodity that distinguish it from commodities of the same name covered by other Schedule B or HTSUSA classifications" (15 CFR 30.6(a)(13));
- "If the shipment requires a license, the description reported in the EEI shall conform with that shown on the license." (15 CFR 30.6(a)(13));
- "When exporting under the authority of a license, you must report on the EEI filing to the AES ... an item description identical to the item description on the license." (15 CFR 758.1(g)(1)).

As you can imagine, meeting even one of these requirements can use 45 or more characters (especially the "item description *identical* to the item description on the license" requirement). Therefore, simply allowing a much higher number of characters in this field (e.g. 200+) would allow exporters to include all of the required information to meet regulatory compliance requirements, and likely solve many issues. (BIS' SNAP-R system allows up to 1,440 characters for each Export Item's technical description, thus to truly enforce the EAR requirement of identical AES description reporting, it should be 1,440+).

Applicability to Temporary Exports / Imports under TMP

One note to all of this is that such a requirement of mandatory serial number reporting in AES might make sense only for Temporary Exports and Imports under TMP in particular, to allow re-import procedures to be followed and verified. However, the requirements proposed in new § 758.10(b)(1)(ii) and § 740.9(b)(5)(iv)(B) already cover this by requiring serial numbers as part of a complete list to be submitted to CBP at the time of import and/or export.

However, it should be noted that if a firearm is shipped under TMP for repair and then found to need replacement under RPL, then the serial number(s) of re-imported / re-exported items would be different than those originally reported to CBP. Perhaps the final rule could address this by providing certification language for such cases, e.g. "Serial # _____ on this shipment is a one-to-one replacement of defective serial # _____ under the authority of RPL. In accordance with the EAR, no further shipments will be made of the defective item already replaced under RPL."

Paperwork Reduction Act analysis

In the Paperwork Reduction Act (PRA) Requirements analysis in the proposed rule, we note a couple of concerns. The PRA analysis rightly states (emphasis added): "The proposed rule would include a

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requirement that, for *all* exports of items controlled under ECCNs 0A501.a...the exporter provide to CBP the serial number, make, model, and caliber for *each* firearm being exported."

However, the analysis goes on to say "The Department of Commerce is carrying over the existing CBP filing requirements for items transferred from the USML to the CCL." We are not aware of any existing CBP or ITAR requirement for explicit reporting of these data elements within AES, and believe this is a new requirement and new information collection.

Further, the analysis goes on to say "The Department of Homeland Security currently is collecting these data elements for firearms "subject to the ITAR" under OMB Control Number 1651-0010 (CBP Form 4457, Certificate of Registration for Personal Effects Taken Abroad). There is no change to the information being collected or to the burden hours as a result of this rule." Again, we believe this is a new collection and not the same as the existing OMB-approved collection referenced. Specifically, CBP Form 4457 is only used for temporary exports, whereas this proposed rule would require these data elements to be reported for *all* firearm exports. As such, in reality there will be a very substantial increase to the burden hours and a new collection as a result of the proposed rule if published as written.

Even when only considering temporary exports recorded on the CBP Form 4457, explicitly requiring the listed data elements is different than the instrument itself which merely requests "Description of Articles", leaving the format up to the exporter and CBP to record in such a way as will allow their proper identification upon re-import.

Note: these PRA-related comments have also been submitted directly to the designated contact at OMB in accordance with the directive in the proposed rule, but should nonetheless be considered and addressed by BIS in their final rule.

2. Change the proposed cut-off year for 'Antique' firearms to match U.S. law, current ITAR, and thus avoid adding additional burden in this rule.

For domestic purposes, U.S. law defines antique firearms (in the Gun Control Act, 27 CFR § 478.11) as those "manufactured in or before 1898". For import purposes, Customs uses the same definition. For export purposes, the same definition and cut-off year has long been used (in the ITAR, 22 CFR 123.17(b)). However, without explanation, this proposed rule would significantly alter the definition of antique firearms by eliminating nine important years of manufacture. In this sense, the proposed rule as written is significantly more burdensome than the ITAR. We export many antique firearms made in the early-to-mid 1890's, such as early Winchester Model 1886, 1892 and 1894 rifles or early Colt Single Action Army revolvers. Under current law, these do not require an export license but can be shipped under exemption. However, changing this definition to "in or before 1890" would significantly and negatively change this, with no added national security benefit. The firearms manufactured in the 1890's do not pose a security threat to our Nation and are merely collector's pieces.

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The lack of any explanation on this significant change in the proposed rule makes it seem almost as if it were a mistake or simple typo. It is our hope that this is the case and that the final rule will align this definition with U.S. domestic, import and historical export law instead of creating a new definition of its own. On the other hand, it seems that this change may be an attempt to align the proposed rule with the Wassenaar Arrangement definitions. If indeed this is the case, we still argue that aligning instead with existing U.S. law ("in or before 1898") is the best policy here, to avoid adding additional burden in this rule and to stay consistent with longstanding U.S. definitions of antique firearm. If however for some reason Commerce Department must align with the Wassenaar, then the proposed rule as written is still wrong. The Wassenaar Arrangement Munitions List uses the 1890 cut-off year for handguns, but actually uses "manufactured earlier than 1938" for antique rifles ([page 175, ML1.a, Note a,b](#)) and shotguns (page 176, ML1.b, Note a). Therefore, if aligning to Wassenaar, the year for rifles must be changed to "in or before 1938" and a similar definition of non-controlled antique shotguns must be added to 0A502.

Even if not aligning to Wassenaar in the final rule, we do request that the final rule adds a definition and cut-off year for antique shotguns to 0A502, ideally the same "in or before 1898" under other U.S. law. It does not make sense to have such a definition of antique rifles and handguns to allow for export of such items without a license but not have such a definition for antique shotguns. Shotguns are arguably already less military sensitive (thus their long-time inclusion as a dual use item on the EAR rather than on the ITAR). So, to allow for export of a handgun made in 1889 without a license but require a full export license for a sporting shotgun made in the same year does not make sense. This could be accomplished by simply adding a "Note 1 to 0A502" stating such. Or, if the existing "Note 1 to 0A501" is meant to include antique shotguns (it does not explicitly leave them out and states "antique firearms" generally), then it should be made more clear to this end.

3. Align availability of LVS at \$500 to 0A502 shotgun-related items.

ECCN 0A501 allows a list based license exception for LVS at a \$500 threshold for 0A501.c, .d, and .x (and including .e if the ultimate destination is Canada). We greatly appreciate this being brought over from the comparable exemption(s) in the ITAR, and understand the justification for simplifying to a net \$500 value (vs. 'wholesale' value under the ITAR).

However, ECCN 0A502 for shotguns does not allow for LVS at any amount for comparable items. While we recognize that many small shotgun parts are not listed and thus EAR99, the proposed rule would control shotgun trigger mechanisms, magazines and magazine extension tubes more stringently than comparable parts for 0A501 rifles and handguns. For example, a \$45 two-round extension tube for a Remington 870 shotgun ([such as this item](#)) would require an export license, while a case of 0A501.d rifle magazines worth \$450 could be exported without a license under LVS.

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Thus, we suggest aligning availability of LVS at \$500 to 0A502 shotgun-related items. Since these parts are currently listed in the ECCN 0A502 heading, the heading could be changed to “Shotguns and related commodities (See List of Items controlled)...” then under the “List of Items Controlled” enumerate the items to include “complete trigger mechanisms”, “magazines”, and “magazine extension tubes” with corresponding reasons for control allowing LVS for such items to the same \$500 limit as for 0A501 items.

4. Align dollar value threshold of LVS for 0A505 ammunition components to \$500.

We greatly appreciate the inclusion of 0A505.x ammunition components in the LVS exception for that ECCN. However, we find the \$100 limit to be low in many instances. Typically, to justify the cost of an international shipment, an order for such items is usually between \$100 to \$500. Per-unit cost of items such as unprimed brass can also be relatively high, particularly for specialty items likely to be sourced for a small shipment. For example, a recent shipment of Norma USA .470 Nitro Express reloading brass was \$5.44 per piece. They come in boxes of 25, so just two small boxes are worth \$272. Thus such a shipment would require a license if the LVS threshold is kept at \$100. We request that it be aligned to the other related LVS thresholds for firearms-related items at \$500 for consistency and usability.

5. Define 'Complete Breech Mechanism' (for 0A501 and 0A502).

The ITAR has long used the term “complete breech mechanism” without any definition to guide industry as to the meaning of this non-standard terminology. As this proposed rule continues to use this term, we request that a definition be provided. Over the years we have received varying definitions from representatives of DDTC. Our attempt to obtain an official written definition by means of an Advisory Opinion request was directed to instead be submitted as a request for an item-specific Commodity Jurisdiction. The most clear definition we’ve received to date is something comparable to a “complete bolt” or “complete bolt carrier group.”

To the extent that what is meant by “Complete Breech Mechanism” may possibly be covered by the enumerated items in 0A501.c, it could possibly even be deleted altogether. However, presuming that something additional is meant by this term being kept in a separate 0A501.e (and in the heading of 0A502), a definition is required for industry to properly comply with the proposed rules.

6. Add License Exception ‘Servicing and replacement (RPL)’ as a valid purpose for a temporary import under new § 758.10.

License exception RPL (§ 740.10(b)) allows for ‘Servicing and replacement’ including overhaul and reconditioning, so long as it does not change the basic characteristics (e.g. accuracy, capability, performance, or productivity) of the commodity. This is similar to comparable ITAR temporary import license exemption found at 22 CFR 123.4(a)(1).

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So, it is our understanding that a firearm could be sent from a foreign sender to a United States party for servicing – a temporary import. However, the new § 758.10 “Entry clearance requirements for temporary imports” do not address the potential use of RPL for this purpose. Specifically, proposed § 758.10(b)(1)(i) requires a statement to CBP certifying “...This shipment will be exported in accordance with and under the authority of License Exception TMP.” However, if it was going under RPL rather than TMP, this statement would be a false certification.

7. Clarify the classification of Combination Guns.

From time to time we deal with firearms known as “combination guns”. Such firearms have at least one rifled barrel and at least one smoothbore barrel (generally a shotgun style barrel). While our reading of the proposed rules would leave us to believe 0A501 is the best fit for such items, we suggest that BIS add clarity on their proper classification.

This could be accomplished by changing the heading of ECCN 0A501 to instead read “0A501 Firearms (including combination guns, but excluding 0A502 shotguns) ...”. Or, a “Note 2 to 0A501” could be added to the bottom of that ECCN to read something like “Combination guns (those with at least one rifled barrel and at least one smoothbore barrel) are controlled by this ECCN.” Alternately, if they should instead be classified under 0A502 or otherwise, this should be clearly noted in the final rule.

8. Clarify that new § 758.10 requirements do not apply to temporary imports under the provisions of ATF Form 6 NIA (27 CFR 478.115(d)).

The proposed rules appropriately add §740.14(e)(4) to clarify that nonresident aliens leaving the United States may export 0A501 firearms and ammunition that they imported under the provisions of 27 CFR 478.115(d). However, the new § 758.10 “Entry clearance requirements for temporary imports” appears to apply to *all* temporary imports at the time of temporary import.

As the requirements of § 758.10 should not apply to nonresident aliens temporarily importing firearms under the separate provisions of the ATF, this should be clarified in the final rule. Wording to this effect could be added to § 758.10(a), ‘Scope’, whether within the body of (a) or as a new subparagraph (3). This would eliminate confusion wherein CBP may attempt to enforce the provisions of § 758.10 on nonresident aliens bringing firearms into the U.S. with an approved ATF Form 6 NIA for a hunting trip or shooting competition.

If this was not an oversight but rather the intent of BIS that § 758.10 would apply to such nonresident aliens, we strongly urge BIS to reconsider their position. Much like the challenge of the AES filing requirement for personal firearms being temporarily exported, requiring foreign persons to follow commercial procedures for temporary import and re-export (including AES filing) would be extremely cumbersome. New § 758.10 should not apply to such cases, and it should be made clear as such.

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10. Clarify whether 0A501.y includes only the specific enumerated y.1 through y.6, or all “specially designed” “parts,” “components,” “accessories” and “attachments”.

ECCN 0A501.y lists six specific types of specially designed “parts,” “components,” “accessories” and “attachments” in various sub-paragraphs y.1 through y.6. However, the .y paragraph is not clear whether these are the only items controlled under .y, or if others not enumerated are included. While we do not believe this is intended to be a ‘catch-all’ like .x, it is not as clear as the .y sections of other ECCNs which tend to use the wording “as follows” when applicable preceding an enumerated list.

For example, a set of fiber-optic sights for a pistol are not “iron sights” as listed in y.3, but may be “specially designed” “attachments.” Would such an item be controlled under .y? Even though Controls only apply to .y for UN and AT purposes, whether such non-enumerated “attachments” require AES filing, etc. for most countries depends on the clarification of this .y sub-paragraph.

11. Explicitly clarify the classification of detachable firearm magazines with capacity ≤ 16 rounds.

Another potential “attachment” item that would benefit from explicit clarification in this regard is detachable magazines for 0A501 firearms with a capacity of less than or equal to 16 rounds. While 0A501.d explicitly lists magazines with a capacity of greater than 16 rounds, common magazines with a lesser capacity are sure to be one of the most shipped items related to firearms.

We have already heard varying interpretations from highly reputable firms within the industry as to whether such magazines would be controlled. For example, those who interpret such magazines as an “attachment” (they are not necessary for the operation of a firearm, but do enhance their usefulness), and who understand the .y paragraph to only include those specifically-enumerated items (see above), have stated that such magazines are EAR99. On the other hand, those who interpret .y to include all “specially designed” “attachments” in addition to those specifically enumerated, believe that such magazines are controlled under .y and require AES filings regardless of destination.

To eliminate this confusion, a “Note” could be added to the bottom of the ECCN, such as “Note 3 to 0A501: Detachable magazines with a capacity of less than or equal to 16 rounds “specially designed” for a commodity controlled by paragraph .a or .b of this entry are classified as “attachments” and are EAR99 commodities.”

12. Eliminate duplicative new § 762.2(a)(11) recordkeeping requirement.

Proposed new § 762.2(a)(11) would add as an EAR record the “serial number, make, model and caliber for any firearm controlled in ECCN 0A501.a” and for certain shotguns. However, the Government already requires such records to be kept under the provisions of the Gun Control Act (GCA). Thus, the requirement that exporters maintain such as an EAR record is unnecessarily duplicative and



burdensome. Under the time-tested provisions of the GCA, the government already has access to such records for inspection as needed.

Proposed Effective Date of Final Rule

We suggest that BIS implement a split effective date for the Final Rule, as was done for the 2014 final rule in 79 FR 37535. In the case of the proposed rule now at hand, many companies will require the full 180 days to make changes to their internal systems and classification matrixes. As such, a 180 day effective date should be allowed for such companies. On the other hand, smaller companies who are most burdened by the registration costs and other requirements of the ITAR, will be more agile and able to switch over earlier. For example, gunsmiths who do no exporting but are currently required to register and pay related fees to DDTC would benefit greatly from an immediate (or very short) effective date of the final rule. To the extent possible, a split effective date (immediate / 180 days) would be advisable.

Regardless of the effective date published in the final rule, we respectfully request that BIS and DDTC complete their review of comments and publish a Final Rule as soon as is reasonably possible. Given the long-awaited nature of these rules, prompt publishing of the Final Rule after appropriate review and consideration of all comments would be greatly appreciated and beneficial to both industry and government.

Summary and Conclusion

While we have raised a number of important concerns specific to the implementation of this proposed rule, we wish to emphasize again our overall support of the transition of these items from the ITAR to the EAR. The justification provided is clear and absolutely sensible. Regardless of recent politicization of the issue by some in Congress and the media, this has truly been an historic bipartisan effort over many years, starting in the earliest days of the Obama administration and now coming to fruition under the current administration.

On a separate but related note, BORDERVIEW also requests the publishing of BIS' already-drafted 'shotgun rule' to allow the Canadian IIC to act as the export authorization for shotguns to Canada.

BORDERVIEW looks forward to your publishing of the Final Rule after careful review of our enclosed comments, and those of other impacted parties. Please do not hesitate to contact me with any questions.

A handwritten signature in black ink that reads "Joel VanderHoek". The signature is fluid and cursive, with the first and last names being more prominent.

Joel VanderHoek

President & Operations Manager

BORDERVIEW | *International Firearm Logistics*

joel@borderview.com phone: +1 (877) 947-4867

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PUBLIC SUBMISSION

As of: 7/12/18 9:00 AM
Received: July 09, 2018
Status: Posted
Posted: July 12, 2018
Tracking No. 1k2-946r-p0t5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-0322

Public Comment 1000. Individual. R Dobbins.7-9-18

Submitter Information

Name: Roberta Dobbins

General Comment

I strenuously object to the proposed rule to transfer regulation of firearms exports from the State Department to the Department of Commerce. The State Department is best equipped to handle this role. It is vitally important for the United States to restrict sales of firearms to oppressive regimes and prevent them to falling into the hands of terrorist and organized crime groups. Given the emerging tensions and uncertainties in international relations, firearm exports require increased regulation as military devices, not less.

PUBLIC SUBMISSION

As of: 7/16/18 3:03 PM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-vxwh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1212

Public Comment 1001. Individual. laura harness. 7-3-18

Submitter Information

Name: laura harness

General Comment

Please keep arms regulations under the DOS to keep the world a safer place. Unregulated arms sales will increase violence in the world therefore increasing immigrants seeking asylum, such as those from central America. The commerce dept is focused on sales and profits and isn't the appropriate organization to regulate arms sales.

PUBLIC SUBMISSION

As of: 7/16/18 3:04 PM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-7uip Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1214

Public Comment 1002. Individual. Pat Dingleberry. 7-3-18

Submitter Information

Name: Pat Dingleberry

Address:

111 Sterling Ave

Jersey City, NJ, 07305-1425

Email: pdingleberry@comcast.net

General Comment

I think moving control of international firearms sales from the State Dept. to the Dept. of Commerce would be a huge mistake, especially because Congress would be out of the loop and this could have serious complications for the international community. The Dept. of Commerce's job is to promote sales with no regard to the possible consequences, therefore I strongly oppose this change.

PUBLIC SUBMISSION

As of: 7/16/18 3:05 PM
Received: July 03, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942r-upqi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1216

Public Comment 1003. Individual. Karen Jacques. 7-3-18

Submitter Information

Name: Karen Jacques

Address:

1209 T St

Sacramento, CA, 95811

Email: threegables1819@gmail.com

General Comment

I want to express my strong opposition to switching the oversight of firearms sales to buyers in other countries from the State Department to the Department of Commerce. At least under State Department authority Congress is notified of such sales and can choose to block there for national security reasons even to countries with blatant human rights violations. The proposed change will likely make it easier for terrorists, criminal gangs and other dangerous organizations to get their hands on these weapons. As far as I can tell, the only people who will benefit from this change are the firearms manufacturers and the criminals who will be able to get firearms more easily.

PUBLIC SUBMISSION

As of: 7/16/18 3:06 PM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-5zsj Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1218

Public Comment 1004. Individual. Amy Dewey. 7-3-18

Submitter Information

Name: Amy Dewey

General Comment

I oppose switching regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 3:06 PM Received: July 03, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942r-ab9q Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1219

Public Comment 1005. Individual. Priscilla Bade. 7-3-18

Submitter Information

Name: Priscilla Bade

Address:

PSC 80 BOX 14131

APO, 96367

General Comment

The approval of gun sales outside the US concerns me.

These guns may be used in acts of organized crime, political violence, terrorism, and human rights violations as well as an n crimes against American citizens.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The Commerce Department does not have adequate staffing to enforce regulation and monitoring. Moreover, enforcement of regulation in other domains would prove nearly impossible.

PUBLIC SUBMISSION

As of: 7/16/18 3:08 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-tni6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1220

Public Comment 1006. Individual. Kae Bender. 7-4-18

Submitter Information

Name: Kae Bender

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. State Department focuses on safeguarding our nation whereas the U.S. Commerce Department focuses on promoting American business. Clearly the concern of firearms in the wrong hands is of fundamental concern to the State Department, whereas the Commerce Department would only want to sell more arms abroa. We must insist that the security of our nation take precedence over the profits of some arms providers.

Firearms exports are rightly classified as military" and blocking sales of large batches of firearms to foreign countries is a reasonable control to prevent the unleashing of weapons into the hands of those who could cause serious harm to human rights, international relations, or even our own national security. Further, commercial export of large caches of American guns and ammunition could make it too easy for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain enough weapons to wreak havoc around the world. These are serious concerns.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Exporting firearms should be subject to more controls, not less! The Commerce Dept. is NOT ready or able to maintain the stringent controls and oversight that is needed to keep weapons trade restricted enough to handle export licensing, shipment inspections, and other appropriate restrictions on the types, quantities, and categories of firearms exports.

PUBLIC SUBMISSION

As of: 7/16/18 3:08 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942s-i27e Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1222

Public Comment 1007. Individual. Carol Olivier. 7-4-18

Submitter Information

Name: Carol Olivier

Address:

2451 s Kent-Des moines

Seattle, WA, 98198

Email: sagefemmes@yahoo.com

Phone: 206-599-9400

General Comment

I oppose changing regulation of gun sales to the commerce dept. guns are deadly, period. We already are the world's largest gun exporter and the whole world is violently unstable as a consequence. No one can afford the consequences of more violence if there is a lack of oversight and regulation of weapon sales.

Sincerely, Carol Olivier

PUBLIC SUBMISSION

As of: 7/16/18 3:09 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-dqt2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1224

Public Comment 1008. Individual. Andrew Aguiar. 7-4-18

Submitter Information

Name: Andrew Aguiar

General Comment

We dont need more commerce involving the gun trade!

PUBLIC SUBMISSION

As of: 7/16/18 3:10 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-jcfq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1225

Public Comment 1009. Individual. Francis Fedoroff. 7-4-18

Submitter Information

Name: Francis Fedoroff

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns are weapons not commodities. Gun sales require special oversight.

PUBLIC SUBMISSION

As of: 7/16/18 3:11 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-p9vv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1227

Public Comment 1010. Individual. Kathy Yeomans. 7-4-18

Submitter Information

Name: Kathy Yeomans

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Guns have only one use and that is to kill.

PUBLIC SUBMISSION

As of: 7/16/18 3:12 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-knfd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1229

Public Comment 1011. Individual. Bart Ryan. 7-4-18

Submitter Information

Name: Bart Ryan

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere.

This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would remove the State Departments block on the 3D printing of firearms.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Also...

More guns against America is more guns against America, no matter how thinly or big you slice it for

Republicans or for Democrats. Even the Trump administration should realize how destructive and dangerous this really is.

PUBLIC SUBMISSION

As of: 7/16/18 3:13 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-xrxu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1230

Public Comment 1012. Individual. Kim Myers. 7-4-18

Submitter Information

Name: Kim Myers

Address:

376 Dee Farrell Rd
Pittsboro, NC, 27312

Email: flyingmoosegal@yahoo.com

Phone: 9194821480

Fax: 27312

General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. How many more people have to be gunned down in the world or will it take the murder of someone in your family for it to finally hit home! I am trying to raise my 7 and 8 year old granddaughters, and if I could move to any other country to escape what is happening to America, I surely would. I do not want to raise them where going to school has become deadly. I am embarrassed to be an American. With this president, it is only about the money anymore.

PUBLIC SUBMISSION

As of: 7/16/18 3:13 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942s-duiv Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1231

Public Comment 1013. Individual. Jeffrey Greif. 7-4-18

Submitter Information

Name: Jeffrey Greif

General Comment

Firearms exports should continue be classified as "military" and remain under the control of the Department of State. I oppose the proposed rule change.

PUBLIC SUBMISSION

As of: 7/16/18 3:14 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-cfgv
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1233

Public Comment 1014. Individual. Rene Maas. 7-4-18

Submitter Information

Name: Rene Maas

Address:

16908 51st Avenue N.

Plymouth, MN, 55446

Email: rgmaas12@yahoo.com

Phone: 7633549423

Fax: 55446

General Comment

Hi - I believe that firearm sales outside of the US need to be monitored by the State Department and not by the Commerce Department. The State Department has many more resources worldwide to track large sales and shipments and to keep Congress up to date with any concerns. The Commerce Department does a great job monitoring the areas it is responsible for, but worldwide sales of American firearms should not be one of its responsibilities. Can you tell if a shipment or large sale went to Russia or Spain?? To Iraq or ISIS??? The State Department can.

Thank you for listening!

PUBLIC SUBMISSION

As of: 7/16/18 3:17 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-z35f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1236

Public Comment 1015. Individual. Lowell Richardson. 7-4-18

Submitter Information

Name: Lowell Richardson

Address:

5050 Osgood Way

Fair Oaks, 95628

Email: lowell@catalinadirect.com

Phone: 9162173932

General Comment

Why would we switch the regulation of firearms exports from the State Department to the Commerce Department? Our government should not be in the business of promoting lethal firearm sales around the world. We should reducing

We must limit firearms exports to oppressive regimes, not encourage them. We must strengthen safeguards that help keep organized crime and terrorist organizations from obtaining weapons, not weaken them.

Why would our government eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them?

One good example of the danger of unregulated gun sales is the rampant smuggling of guns across the Mexican border. The vast amount of weapons easily available across the boarder, sourced from unregulated American gun shows has turned Mexico into a killing field. We do not need to promote the same death and destruction in other parts of the world by removing licensing requirements for brokers.

And removing the State Departments block on the 3D printing of firearms BY transferring the authority to the Department of Commerce is simply ridiculous.

PUBLIC SUBMISSION

As of: 7/16/18 3:18 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-n52x
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1237

Public Comment 1016. Individual. Jim Yarbrough. 7-4-18

Submitter Information

Name: Jim Yarbrough

General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. This rule change would dangerously reduce control and oversight of firearms. Firearms export should continue to be regulated by U.S. State Department.

PUBLIC SUBMISSION

As of: 7/16/18 3:18 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-2yqa
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1238

Public Comment 1017. Individual. Laurie Meisenheimer. 7-4-18

Submitter Information

Name: Laurie Meisenheimer

General Comment

I can't believe anyone is even thinking of moving something so desperately in need of careful, vigilant and well staffed regulation as arms sales from the State Department to the Department of Commerce. Arms in the wrong hands are the most dangerous thing that can happen to folks!!! It causes so much carnage to innocent folks. It does nothing but harm! Dont let it happen!!!!

PUBLIC SUBMISSION

As of: 7/16/18 3:19 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-shqx
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1239

Public Comment 1018. Individual. Carolyn Lilly. 7-4-18

Submitter Information

Name: Carolyn Lilly

Address:

6114 Caminito Sacate

San Diego, 92120

Email: cclilly@icloud.com

Phone: 6195019345

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Only YOU can stop the carnage of our children and all people, so do your responsibility - no corruption!

PUBLIC SUBMISSION

As of: 7/16/18 3:20 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942s-vlsk Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1240

Public Comment 1019. Individual. jef weisel. 7-4-18

Submitter Information

Name: jef weisel

Address:

44 high st

keene, 03431

Email: wowwees@yahoo.com

Phone: 6039037329

Fax: 03431

General Comment

keep state dept in charge of export licensing for weapons, especially semi- and automatic weapons!

PUBLIC SUBMISSION

As of: 7/16/18 3:20 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-i0x6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1241

Public Comment 1020. Individual. Barbara Holcomb. 7-4-18

Submitter Information

Name: Barbara Holcomb

General Comment

The US is already one the largest exporters of firearms. Please do not make the world more violent by enacting the proposed rule.

PUBLIC SUBMISSION

As of: 7/16/18 3:21 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-c595
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1242

Public Comment 1021. Individual. Nancy Borelli. 7-4-18

Submitter Information

Name: Nancy Borelli

Address:

Santa Rosa Va, CA, 93012

Email: nancyborelli@gmail.com

Phone: 8059076523

General Comment

Do not remove the responsibility of regulating firearms for export from the State Department and move it to the Commerce Department. The State Department has a multi-layer oversight system with licensing and multiple inspections firmly in place, and the Commerce Department does not have the resources to provide the same protections. Moving the regulation of firearms exports to the Commerce Department would make the world a much more dangerous place. Do not allow the Commerce Department to take the responsibility of regulating firearms exports away from the State Department, which is handling the responsibility effectively.

PUBLIC SUBMISSION

As of: 7/16/18 3:22 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-2f9c
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1243

Public Comment 1022. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose switching the regulation of firearms exports from the Sate Department to the Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is an all around bad idea that would make everyone less safe.

PUBLIC SUBMISSION

As of: 7/16/18 3:23 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-om60
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1244

Public Comment 1023. Individual. Sue Whitlock. 7-4-18

Submitter Information

Name: Sue Whitlock

General Comment

You are absolutely crazy if you think semi-automatic weapons no longer warrant control!!! The President will have security guards-we won't! Anybody can shoot anybody then! Do not pass this!!

PUBLIC SUBMISSION

As of: 7/16/18 3:23 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-g4o0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1245

Public Comment 1024. Individual. Deborah Meckler. 7-4-18

Submitter Information

Name: Deborah Meckler

Address:

3948 Stein Ct

So San Francisco, 94080

Email: deborahmeckler@comcast.net

Fax: 94080

General Comment

I oppose moving the regulation of overseas gun sales from the State Department to the Commerce Department. Guns are for killing people. They are not commodities to be sold like soybeans. They are ugly, killing machines. They should NOT be treated as if they were harmless merchandise. Why are we as a nation promoting killing?

PUBLIC SUBMISSION

As of: 7/16/18 3:24 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-g0tl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1246

Public Comment 1025. Individual. Susannah Gelbart. 7-4-18

Submitter Information

Name: Susannah Gelbart

General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. There is no reason to remove these requirements. Also, it would remove licensing requirements for brokers, increasing the risk of trafficking. Finally, it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Just watch the newly released video of the police department in Las Vegas being too scared to take out the gunmen on October first. They knew they were far out gunned. They know how dangerous and deadly guns are. Fifty-eight died, while the police were right in the building completely aware of where the shots were coming from. They did not stop the killing. Laws need to do more to better protect unarmed citizens, everyday.

PUBLIC SUBMISSION

As of: 7/16/18 3:25 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942s-elqa Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1247

Public Comment 1026. Individual. Jo Ann Potashnick. 7-4-18

Submitter Information

Name: Jo Ann Potashnick

Address:

528A W. Barry Avenue
Chicago, IL, 60657-5417

Email: jarp@rcn.com

Phone: 7738834441

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This reduces security for us citizens everywhere!

PUBLIC SUBMISSION

As of: 7/16/18 3:26 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942s-oq4t
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1248

Public Comment 1027. Individual. Anonymous Wood. 7-4-18

Submitter Information

Name: Anonymous Wood

General Comment

I am strongly opposed to the proposal to change the regulation of firearm sales from the state department to the department of commerce. A move like this would likely destabilize many other countries and places in the world by providing easier access to firearms with fewer regulations on who can purchase them and for what purpose. Firearm sales outside of the US are military deals and should be regulated and controlled tightly. I believe the state department is better equipped and prepared to provide this regulation than the commerce department.

PUBLIC SUBMISSION

As of: 7/16/18 3:26 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-6fsi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1249

Public Comment 1028. Individual. Dr. Demian. 7-4-18

Submitter Information

Name: Dr. Demian

Address:

Seattle, WA, 98146

Email: demian@buddybuddy.com

General Comment

DO NOT change the U.S. State Department rules regarding firearms exported from America.
DO NOT allow the U.S. Commerce Department to have control of exports.

Thank you.

Dr. Demian

PUBLIC SUBMISSION

As of: 7/16/18 3:27 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-lywm
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1250

Public Comment 1029. Individual. RedLion York. 7-4-18

Submitter Information

Name: RedLion York

Address:

2001 Creekwood Dr
Fort Collins, 80525

Email: redyork@gmail.com

Phone: 9702215929

Fax: 80525

General Comment

Howdy,

Switching the responsibility for overseeing weapons sales from the State Dept to the Commerce Dept is a bad idea for these reasons:

- a) It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- b) It would remove licensing requirements for brokers, increasing the risk of trafficking.
- c) It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The world is dangerous enough. We don't need this change.

PUBLIC SUBMISSION

As of: 7/16/18 3:28 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-88ks
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1251

Public Comment 1030. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. In my opinion, this is a bad decision that could have implications affecting our national security, and should be rejected outright.

Thank you for your time,

PUBLIC SUBMISSION

As of: 7/16/18 3:30 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-fyrg
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1252

Public Comment 1031. Individual. Jean Schwinberg. 7-4-18

Submitter Information

Name: Jean Schwinberg

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The U.S. Commerce Department is focused on promoting American business, not on safeguarding the nation, which is the responsibility of the U.S. State Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/16/18 3:31 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-st08
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1253

Public Comment 1032. Individual. Mo Kafka. 7-4-18

Submitter Information

Name: Mo Kafka

Address:

Provincetown, MA, 02657

Email: mokafka@gmail.com

Phone: 5184341600

Organization: Building Integrity

General Comment

Thank you for considering this important concern. Currently, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It is essential that this rule not be changed as it will not benefit national security or international relations and it will make the world a more dangerous place.

PUBLIC SUBMISSION

As of: 7/16/18 3:31 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-aqnk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1254

Public Comment 1033. Individual. Margaret Stofsky. 7-4-18

Submitter Information

Name: Margaret Stofsky

Address:

2534 Manzanita Ave
EUREKA, CA, 95503

Email: mstofsky87@gmail.com

Phone: 9142614849

General Comment

I oppose the proposed rule change. It would give firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/16/18 3:33 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-b68j
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1255

Public Comment 1034. Individual. Sean Kelly. 7-4-18

Submitter Information

Name: Sean Kelly

General Comment

I strongly oppose shifting firearms oversight from the State Department to the Commerce Department. Streamlining and encouraging the sale of firearms, and reducing inspections and enforcement, is solidly AGAINST the interests of the U.S.:

Internationally, high firearm availability correlates strongly with high firearm violence and fatalities. Making firearms more available WITHIN the U.S. by putting less scrutiny on shipments is the OPPOSITE of what we need to do in a climate of increasing criminal shooting acts.

Many of the most pressing international crises, from conflict in the middle east to the migration crisis from Central America, are fueled by violence utilizing American-made weapons. By making it easier to get American firearms abroad, we are only jeopardizing our OWN national interests.

While it is ultimately impossible to outright prevent individuals from acquiring information to design and/or manufacture firearms and components via 3D printing techniques, it is senseless to remove existing barriers to doing so. More firearms of questionable quality in the hands of more people with questionable training is an absolute recipe for disaster.

PUBLIC SUBMISSION

As of: 7/16/18 3:35 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942t-vby6 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1256

Public Comment 1035. Individual. Gale Green. 7-4-18

Submitter Information

Name: Gale Green

Address:

1329 Sycamore #106

DeKalb, IL, 60115

Email: gggreen@wisc.edu

Phone: 815 517-8981

General Comment

Guns need to be treated with the utmost respect, especially the governing of them. Please leave that responsibility in the hands of the U.S. Department of State, whom I believe are in a better position to protect the welfare of all our citizens. Thank-you and God Bless all concerned. Gale M. Green

PUBLIC SUBMISSION

As of: 7/16/18 3:35 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-6hyu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1257

Public Comment 1036. Individual. Nancy Lemmon. 7-4-18

Submitter Information

Name: Nancy Lemmon

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It seems IRRESPONSIBLE to hand over such a sensitive matter to our national security to a body focused on commerce.

PUBLIC SUBMISSION

As of: 7/16/18 3:36 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942t-yub2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1258

Public Comment 1037. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose changing the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This rule change would make the world a far more dangerous place because the Commerce Department is not equipped to handle the terrible global security problems that they could create.

PUBLIC SUBMISSION

As of: 7/16/18 3:37 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-9lv0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1259

Public Comment 1038. Individual. Michael Olcsvary. 7-4-18

Submitter Information

Name: Michael Olcsvary

Address:

United States, 98036

Email: olcsvary@frontier.com

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Military equipment could very well end up in the hands of some less-than-friendly individuals or groups.

PUBLIC SUBMISSION

As of: 7/16/18 3:37 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-beym
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1260

Public Comment 1039. Individual. Justin Mebane. 7-4-18

Submitter Information

Name: Justin Mebane

Address:

Wilmington, NC, 28411

Email: superjustin11@aol.com

General Comment

This rule change will transfer regulation of foreign arms from the State Department to the Commerce Department - which does not have the resources necessary to keep track of these sales. This would be a major threat to our national security and fuel instability in other countries - increasing migration to the US. This rule needs to be rejected immediately.

PUBLIC SUBMISSION

As of: 7/16/18 3:38 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-524k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1261

Public Comment 1040. Individual. Suzanne Phillips. 7-4-18

Submitter Information

Name: Suzanne Phillips

Address:

906 Puget Way

Edmonds, WA, 98020

Email: Gzy906@gmail.com

Phone: 425 967-7640

General Comment

Firearms are dangerous and exist only to kill. They should be less available to all and certainly not exported for pure profit motives. People die daily from their existence. Making money off of the death of innocents is horrendous.

PUBLIC SUBMISSION

As of: 7/16/18 3:39 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-61ft
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1262

Public Comment 1041. Individual. Donia Connell. 7-4-18

Submitter Information

Name: Donia Connell

Address:

2825 NE County Road 329
Anthony, FL, 32617

Email: jdconnell@embarqmail.com

Phone: 3522246115

Fax: 32617

General Comment

The NRA only cares about making a buck. This switch could and most likely would benefit terrorist groups being funded by corrupt countries.

If the NRA gets their wish, all the countries weve unjustifiably attacked, who with good cause now hate us are certain to have top of the line weapons to kill us with.

PUBLIC SUBMISSION

As of: 7/16/18 3:40 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-b213
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1263

Public Comment 1042. Individual. Robert Heisler. 7-4-18

Submitter Information

Name: Robert Heisler

Address:

san francisco, CA, 94116

Email: ROBIKAM_2000@YAHOO.COM

Phone: 4156652597

Organization: OVER THE AIR, NO CABLE MAFIA RIPOFF FOR ME!

General Comment

Arms sales need to be even more restricted and regulated, not less. US arms sales are contributing to massive terrorism and human rights abuse because of our loose oversight.

.The American people are sick of the control the NRA has over the legislators who swore to protect and uphold the will of the American people. The NRA is and operates as a criminal syndicate with the republican party as it's paid agent in congress.

PUBLIC SUBMISSION

As of: 7/16/18 3:41 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942t-m6s2 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1264

Public Comment 1043. Individual. Onishea Aguilera. 7-4-18

Submitter Information

Name: Onishea Aguilera

Address:

107 Avenida Del Sol
Lordsburg, NM, 88045

Email: onisheaaguilera@yahoo.com

Phone: 5753131715

Fax: 88045

General Comment

I myself love guns but I do not support these weak gun laws and I never will support the crooked NRA!!!

PUBLIC SUBMISSION

As of: 7/16/18 4:00 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-mxad
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1271

Public Comment 1044. Individual. Robert Hall. 7-4-18

Submitter Information

Name: Robert Hall

General Comment

I strongly OPPOSE changing the classification of selling firearms to foreign countries that would switch such sales from the US State Dept. to the US Commerce Dept.

Selling weapons to other countries is not selling a commodity, like wheat; it is selling lethality and this needs the continued oversight of the State Dept.

PUBLIC SUBMISSION

As of: 7/16/18 4:01 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942u-iby6 Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1272

Public Comment 1045. Individual. Diana Morgan-Hickey. 7-4-18

Submitter Information

Name: Diana Morgan-Hickey

General Comment

Stop all gun promotion-in the States or around the world.

PUBLIC SUBMISSION

As of: 7/16/18 4:02 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-j8kq
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1273

Public Comment 1046. Individual. Anneliese Schultz. 7-4-18

Submitter Information

Name: Anneliese Schultz

Address:

76 Lawrence Road

Gray, ME, 04039

Email: aschultz@mail.ubc.ca

General Comment

I oppose any rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe this would be an extremely dangerous, causing arms sales to vastly increase internationally, with serious implications for our national security.

If this change were made, firearms exports to oppressive regimes would be facilitated, safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons would be removed, and the violence that destabilizes countries and causes mass migration would be fueled!

Please oppose this terrible proposal, and help keep our country safe.

PUBLIC SUBMISSION

As of: 7/16/18 4:02 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-ntfz
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1274

Public Comment 1047. Individual. Elaine Fischer. 7-4-18

Submitter Information

Name: Elaine Fischer

Address:

2514 Sharmar Rd.
Roanoke, VA, 24018

General Comment

It is INSANE to sell guns to everyone and not expect them to be turned on us! Please do NOT loosen the rules for firearms export, just to allow for greedy Corporate Profit.

Right now, firearms exports are classified as military (as they should be). This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/16/18 4:03 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942u-7eme
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1275

Public Comment 1048. Individual. Alex Escott. 7-4-18

Submitter Information

Name: Alex Escott

General Comment

I am a gun owner and I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 4:04 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-4q2f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1276

Public Comment 1049. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this rule change that would switch the regulation of firearms export from the US State Dept to the US Commerce Dept.

Controlling gun sales to foreign countries is important to countering terrorism, and for ensuring national safety. The US Commerce Dept does not have sufficient resources to regulate these foreign sales adequately. That responsibility should remain with the US State Dept.

PUBLIC SUBMISSION

As of: 7/16/18 4:04 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-5bxi
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1277

Public Comment 1050. Individual. Stephanie Stout. 7-4-18

Submitter Information

Name: Stephanie Stout

General Comment

I do not want the handling of export licenses of semiautomatic assault rifles and other powerful military style firearms moved from the U.S. State Department to the U.S. Commerce Department. Regardless of how profitable the sales of more US made weapons would be to our firearms manufacturers, producing and selling more weapons to more nations of our violent planet would ultimately undermine US safety and security. Criminals and terrorists would use these additional weapons to prey upon Americans and our friends abroad and in our own country. There are already too many weapons loose in the world already. I am a retired US Army combat veteran, and I served to protect my country and our allies and friends, not to promote the profits of GREEDY multi-national corporations. Furthermore, our arms industry should be completely nationalized in order to produce necessary weapons and military equipment for our forces and those of our allies at lower cost and remove the profit motive for selling weapons of war.

PUBLIC SUBMISSION

As of: 7/16/18 4:05 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-yenu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1278

Public Comment 1051. Individual. Betty Winholtz. 7-4-18

Submitter Information

Name: Betty Winholtz

Address:

405 acacia

Morro Bay, CA, 93442

Email: winholtz@sbcglobal.net

General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Not only will lives in other countries be in danger, but guns made here can be used against us.

What are you thinking!

PUBLIC SUBMISSION

As of: 7/16/18 4:06 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-b4xy
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1279

Public Comment 1052. Individual. Will Branch. 7-4-18

Submitter Information

Name: Will Branch

General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change may be beneficial to American business, but it is detrimental to American security.

PUBLIC SUBMISSION

As of: 7/16/18 4:09 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-68po
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1280

Public Comment 1053. Individual. Eloise Prevost. 7-4-18

Submitter Information

Name: Eloise Prevost

Address:

9332 W Mariposa Grande Ln
Peoria, AZ, 85383

Email: EDP1953@AOL.COM

Phone: 5084961428

General Comment

Do not change policies to the commerce dept !!!! It is all about \$\$\$ and not safety. Guns kill in the wrong hands. This is not good. The world is evil enough without providing firearms to bad individuals. It is more than obvious. Too many people in office care more about how much money can be made in business transactions than the world wide safety of people and animal lives.

Every day someone in government is ripping apart government policies and trying to undo protections. Elected officials need to listen to the public and not the big greedy corporations.

Really sad that our American government can't even balance their own budget and continually waste so much money to the point of debt in the trillions of dollars.

PUBLIC SUBMISSION

As of: 7/16/18 4:10 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-itkf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1281

Public Comment 1054. Individual. Natasha Gubert. 7-4-18

Submitter Information

Name: Natasha Gubert

General Comment

please do not allow the purview of firearms sales to be transferred from the State Department to the Commerce Department. The proliferation of arms sales freed from the oversight now mandated by law would mean that all kinds of evil people could buy high capacity weapons with impunity.

PUBLIC SUBMISSION

As of: 7/16/18 4:11 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-6yax
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1282

Public Comment 1055. Individual. Dave Kisor. 7-4-18

Submitter Information

Name: Dave Kisor

General Comment

Safety is not what the NRA and the gun industry are concerned with. It's sales. They don't care who shoots who, they only see their profit margin going through the roof. The only problem is there are already too many guns out there already. The only positive here is American weapons tend to jam more often than European and Asian weapons, so the American profit margin probably won't be as high as they would like. To that end, the American manufacturers will undoubtedly whine like babies about unfair competition. American manufacturers don't focus on efficiency, but rather mega sales; whereas, European and Asian manufacturers strive for efficiency. During WW2, the Luftwaffe had Rheinmetall design and build a 30MM cannon for their fighters that could take down a bomber with 5 to 7 rounds outside of the range of our 50 calibers and they did it. Bomber crews called it the Jackhammer and it terrified them. A Soviet Sergeant named Kalishnikov acquired a German machine gun on the Eastern front and made some modifications. It was used in the early part of the Korean Conflict and the Army wasn't concerned. After Shenyang got it and put a sealed receiver group in it, our Armed Forces became very concerned over this new weapon, that was to become the most widely used a popular weapon in the world today, the AK-47. Don't expect American weapons to replace that anytime soon.

PUBLIC SUBMISSION

As of: 7/16/18 4:11 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942v-7x0y
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1283

Public Comment 1056. Individual. Mary McLaughlin Sta. Maria. 7-4-18

Submitter Information

Name: Mary McLaughlin Sta. Maria

General Comment

I oppose switching control of firearms from the State to the Commerce Dept. You should be ashamed if money is worth that to you.

PUBLIC SUBMISSION

As of: 7/16/18 4:12 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942w-b62k
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1284

Public Comment 1057. Individual. Barbara Johns. 7-4-18

Submitter Information

Name: Barbara Johns

General Comment

We will keep speaking out and speaking out we will. Our schools are no longer safe why is that? We need to feel safe outside of our homes. People don't want to live in fear anymore. There is way to much shootings going on in America and that is not good. Whatever happened to safety first? Whatever happened to respect and common sense? Whatever happened to morals and values? Do tell? We all would like to know that now. This has gone on long enough now so changes need to be made to make our schools feel safe again. These families of victims are upset, angry and frustrated on how gun control is going. What laws we do have do not work anymore. Guns are not toys. Guns are dangerous. Criminals and guns don't mix. To many innocent lives have been taken. The NRA is not what it use to be. We are disappointed in our government and lawmakers. We don't feel safe anywhere anymore. Children don't feel safe in schools anymore. To many guns out there. There are no gun laws and people can do whatever they want why is that? How are we suppose to feel safe? How are our children suppose to feel safe? This all has gotten way out of control. We are feel upset, angry and frustrated. Why are you letting the NRA get away with this? We are looking out for the families that lost loved ones from these shootings. We all would like answers now. We all would like the truth now. We don't live in a safe America anymore. We need laws that work. We need strict gun laws now. To many shootings going on. No one seems to care anymore why is that? We will keep making noise until things change. People need to feel safe in parking lots, churches, play grounds, malls, stores, movie theatres, parks and anywhere else we are at. This has been a huge issue now. Nothing is being done to protect families, schools and everyday people. We all would like to know where these guns are coming from. Is this to much to ask?

PUBLIC SUBMISSION

As of: 7/16/18 4:17 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942w-vv23
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1285

Public Comment 1058. Individual. William Baker. 7-4-18

Submitter Information

Name: William Baker

Address:

9013 Natalie Ave. NE
Albuquerque, 87111

Email: wmchbaker@gmail.com

Phone: 5052960198

Fax: 87111

General Comment

I am appalled at the idea of removing regulation of firearms exports, which would be the practical effect of having the Commerce Department "regulate" firearms sales. This opens the door to gun purchases by terrorists and repressive regimes, with no congressional oversight. Selling weapons to terrorists is a dumb way for gun manufacturers to make a buck, but obviously that's all they care about.

PUBLIC SUBMISSION

As of: 7/16/18 4:18 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942w-2rzk Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1286

Public Comment 1059. Individual. Edh Stanley. 7-4-18

Submitter Information

Name: Edh Stanley

Address:

Sacramento, CA, 95823-1457

Email: itsEdh@softcom.net

Phone: 9164279095

General Comment

I think Congress should know when large numbers of weapons are sold.

PUBLIC SUBMISSION

As of: 7/16/18 4:18 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942w-q0pc
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1287

Public Comment 1060. Individual. David Benson. 7-4-18

Submitter Information

Name: David Benson

Address:

725 NE Illinois Street

Pullman, WA, 99163

Email: davidbernardbenson@gmail.com

General Comment

I strenuously oppose this proposed rule change.

PUBLIC SUBMISSION

As of: 7/16/18 4:19 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942w-ibr1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1288

Public Comment 1061. Individual. Timothy Beitel. 7-4-18

Submitter Information

Name: Timothy Beitel

General Comment

I will say this again because it is important and it bears repeating, I oppose this change in the rules that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Please dont do this, we should be trying to make things better not worse.

PUBLIC SUBMISSION

As of: 7/16/18 4:20 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942w-eeq1
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1289

Public Comment 1062. Individual. Donald Goldhamer. 7-4-18

Submitter Information

Name: Donald Goldhamer

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Firearms are not mere commodities and the Commerce Department is unequipped to properly control their movement.

PUBLIC SUBMISSION

As of: 7/16/18 4:21 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942w-ov1v
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1290

Public Comment 1063. Individual. Fred Clarke. 7-4-18

Submitter Information

Name: Fred Clarke

Address:

1007 Rosa Parks Blvd Row 8.9n

Nashville, 37208

Email: photozen@gmail.com

General Comment

The situation in the US is not normal, compared to all the other industrialised nations, it is almost primitive. the fact you have to have a gun in the US reflects on the US being an unsafe and unstable country. more guns is not an answer, rather just adding to the escalating problem of gun violence and gun deaths in the US. This problem is partly due to the accessibility of massive numbers of firearms in the US but also the mentality of the US population. The imperialistic nature of the US is also ingrained in the mentality of its own population, not just the government. it is generally manufactured fear, fear the is used to justify many things in the US. It is definitely a cultural thing. The 2nd amendment is constantly being misrepresented as well. thx

PUBLIC SUBMISSION

As of: 7/16/18 4:21 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942x-oeo5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1291

Public Comment 1064. Individual. Elizabeth Schroder. 7-4-18

Submitter Information

Name: Elizabeth Schroder

General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! The Commerce Department just does not have the resources to adequately enforce export controls. I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/16/18 4:22 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942x-5mzf
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1292

Public Comment 1065. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Trump & the NRA want to sell more guns, especially exports. They want it to be easier to export guns.

Guns are lethal weapons & are dangerous. There should be more regulations & controls, not less.

Therefore, I oppose the rule change that would switch the regulation of firearm exports from the US State Department to the US Commerce Department. The Commerce Dept is ill-equipped to handle the process.

PUBLIC SUBMISSION

As of: 7/16/18 4:23 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942x-pm57
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1293

Public Comment 1066. Individual. J.T. Smith. 7-4-18

Submitter Information

Name: J.T. Smith

Address:

Sellersville, PA, 18960

Email: ace910046scal@hotmail.com

Phone: 2672814056

General Comment

Reality check: Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to far more controls, not less!

PUBLIC SUBMISSION

As of: 7/16/18 4:23 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942x-wjt7
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1294

Public Comment 1067. Individual. Cynthia Mastro. 7-4-18

Submitter Information

Name: Cynthia Mastro

General Comment

I oppose a rule change that would allow the Dept. of Commerce to regulate arms shipments.

PUBLIC SUBMISSION

As of: 7/16/18 4:24 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942x-c6ig
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1295

Public Comment 1068. Individual. Michael Dinowitz. 7-4-18

Submitter Information

Name: Michael Dinowitz

Address:

23 Meadow Ave

Medford, NY, 11763

Email: mdinowit@hotmail.com

Phone: 6318032678

Fax: 11763

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer does almost nothing for the citizen while creating opportunity for industrial profit for the firearms industry and NRA. It also removes Congressional ability to oversee and help regulate fire arms sales.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This rule change must be opposed and defeated for the safety of all people both in the US and the world.

PUBLIC SUBMISSION

As of: 7/16/18 4:25 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942x-s2qe
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1296

Public Comment 1069. Anonymous. 7-4-18

Submitter Information

Name: anonymous Anonymous

General Comment

I am very concerned with proposed legislation to change the control of exporting firearms from the State Department to the Commerce Department. Some of the egregious effects would be:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the glob

Most Sincerely

PUBLIC SUBMISSION

As of: 7/16/18 4:26 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-73yk
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1297

Public Comment 1070. Individual. Tara Poelzing. 7-4-18

Submitter Information

Name: Tara Poelzing

Address:

Roanoke, VA, 24015

Email: tarapoelzing@yahoo.com

Phone: 5406823870

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The State Department focuses on safeguarding our nation while the Commerce Department focuses primarily on promoting business.

In the case of firearms, safety should come first and foremost. The potential to move more weapons in the hands of additional dangerous people and regimes must be considered and immediately addressed. This is the first and easiest step to avoid that situation. Oppose the rule change!

PUBLIC SUBMISSION

As of: 7/16/18 4:35 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-g79w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1298

Public Comment 1071. Individual. Carlos Cunha. 7-4-18

Submitter Information

Name: Carlos Cunha

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is clear that one of the reasons Mexico is having so many problems is because of the outflow of American firearms to the country. This rule change will facilitate the process in Mexico and other countries leading to more crime and more immigrants fleeing to the US:.

PUBLIC SUBMISSION

As of: 7/16/18 4:36 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-p57q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1299

Public Comment 1072. Individual. Gavi Stevens. 7-4-18

Submitter Information

Name: Gavi Stevens

General Comment

So now the NRA is trying to dictate foreign policy for our government and what to sell overseas. That is just how arrogant they are and how much they think they control this administration and Congress. This overreach by an organization that has grown into one that tries to control governments from the local to the national has to be stopped before they become the puppet master of our country. We can't allow an organization whose sole purpose is to put lethal weapons into the hands of as many people as possible to dictate policy to our leaders. Allowing increased exporting of assault weapons overseas just means that more insurgents will be using those weapons against us, our military forces and our allies forces, causing that many more deaths and injuries. Is that what you want to be known for? Allowing those young men to die or be wounded unnecessarily just to benefit one organization's lust for power? I can only hope not.

PUBLIC SUBMISSION

As of: 7/16/18 4:37 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-4xqs
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1300

Public Comment 1073. Individual. Mary Kuck. 7-4-18

Submitter Information

Name: Mary Kuck

General Comment

I strongly oppose the above proposed rule. Having lived in the Caribbean for 23 years, I have seen what the influx of illegal weapons has done to destabilize governments. If anyone can buy these legally, we will exacerbate our contribution to the violence that is sending immigrants out of their homes into our country as a last resort for finding safety.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This change should never take place.

Thank you, Mary Kuck

PUBLIC SUBMISSION

As of: 7/16/18 4:38 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-9c5w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1301

Public Comment 1074. Individual. Margaret Heatherly. 7-4-18

Submitter Information

Name: Margaret Heatherly

Address:

10 Wayne Drive
Taylors, SC, 29687

Email: tth42@gmx.com

Phone: 8643228620

Fax: 29687

General Comment

You want more unregulated weapons to kill men, women and children. You want more unregulated weapons to cause death and destruction? You more more unregulated weapons to destabilize the world? You want more unregulated weapons to make it harder for everyone?

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/16/18 4:38 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-wos5
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1302

Public Comment 1075. Individual. M Hewitt. 7-4-18

Submitter Information

Name: M Hewitt

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Stop the nonsensical proliferation of weapons!

PUBLIC SUBMISSION

As of: 7/16/18 4:41 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-gnri
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1303

Public Comment 1076. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

Address: United States,

General Comment

I oppose allowing the Commerce Department to have any thing to do with selling firearms to any foriegn country.

PUBLIC SUBMISSION

As of: 7/16/18 4:42 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942y-2yjb
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1304

Public Comment 1077. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I had been under the impression that this administration was against foreign terrorists and foreign criminals who could hurt American citizens. Deregulating weapons sales to foreign buyers makes America less safe. Part of the mess in Afghanistan was because they had weapons we sold them when we were trying to take out the USSR. Then voila, Taliban!

Because we have legal gun ownership in this country, we have a very active market for guns and American-made weaponry is very high quality. Do we really want it to be easy for those weapons to get in the hands of the next Osama bin Laden?

Oh, I see. Obama killed bin Laden, therefore bin Laden must not have been that bad, and we should encourage more terrorists to continue erasing Obama's legacy. Because MAGA means Make America Vulnerable Again, right?

PUBLIC SUBMISSION

As of: 7/16/18 4:43 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-mwed
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1305

Public Comment 1078. Individual. Carolyn Dipboye. 7-4-18

Submitter Information

Name: Carolyn Dipboye

General Comment

I am extremely. extremely opposed to moving oversight of export of weapons from the State Department to the Commerce Department. Given the situation in our own country and the situation in Mexico and Central American countries due to lax regulation on firearms in our country, this is exactly the wrong move in that it would enable the acceleration of gun violence. I strongly urge you to resist this move. We are at a time when more effective regulation on firearms is critical. We are not at a point where making more money on guns could possibly be beneficial to anyone other than the manufacturers. Please resist this change!

PUBLIC SUBMISSION

As of: 7/16/18 4:43 PM Received: July 04, 2018 Status: Posted Posted: July 16, 2018 Tracking No. 1k2-942z-u8ty Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1306

Public Comment 1079. Individual. Rebecca Anonymous. 7-4-18

Submitter Information

Name: Rebecca Anonymous

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Do not let the NRA run OUR government for gun manufacturers profit.

PUBLIC SUBMISSION

As of: 7/16/18 4:44 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-uqa0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1307

Public Comment 1080. Individual. Louise Backer. 7-4-18

Submitter Information

Name: Louise Backer

General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

The rule change would make the world a far more dangerous place because:

1. It would eliminate the State Departments Blue Lantern program which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms and enable 3D printing of firearms in the U.S. and around the globe.

Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

We dont need more guns in the world or in the United States. We need more oversight to make sure the wrong people dont obtain guns and ammunition.

Why are we helping the US gun industry [NRA] with this proposed change? They should not be the ones to benefit at the incredible expense of innocent peoples safety.

This is morally wrong and unethical. Please do not make the rule change. Do not be beholden to the NRA and the gun industry just because they want to fill their pockets with the profits from the sales. Think of the innocent people who would be impacted adversely.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/16/18 4:45 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-bdyt
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1308

Public Comment 1081. Individual. Mary Beach. 7-4-18

Submitter Information

Name: Mary Beach

Address:

133 W. Cuyahoga Falls Ave
Akron, OH, 44310

Email: beachmaryann@yahoo.com

Phone: 3306343075

General Comment

I am writing to express my opposition to moving the oversight of international weapon sales from the State Department to the Commerce Department. Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 4:45 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-kwfc
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1309

Public Comment 1082. Individual. Jessica Roeder. 7-4-18

Submitter Information

Name: Jessica Roeder

General Comment

I oppose moving the regulation of firearms exports from the State Department to the Commerce Department. Doing so would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents such as organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This change is not in the best interest of our people, or anyone's people.

One detail about the change: the removal of the ban on the 3D-printing of firearms is simply not acceptable.

Please reject this change.

PUBLIC SUBMISSION

As of: 7/16/18 4:46 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-809t
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1310

Public Comment 1083. Individual. Alisa Schlacht. 7-4-18

Submitter Information

Name: Alisa Schlacht

General Comment

I am writing to implore you to prevent the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The United States should be a beacon of light for freedom and justice in the world, not a global supplier of weapons to increase brutality and human suffering. The U.S. Commerce Department should not be responsible for spreading murderous weapons around the world, which will undoubtedly end up being used cruelly against innocent people and likely against Americans as well.

PUBLIC SUBMISSION

As of: 7/16/18 4:47 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-vdbe
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1311

Public Comment 1084. Individual. LeeAnn Chastain. 7-4-18

Submitter Information

Name: LeeAnn Chastain

General Comment

I oppose switching the regulation and exportation of any and all arms from the U.S. Department of State to the Department of Commerce. Such a move would enable the criminal elements in a society to exert even greater power over the law-abiding populations and increase person-to-person crime anywhere such guns are sold.

We must deal with the current problems we have in this country with daily senseless gun deaths and mass shootings and not export our arms and ammunition to other nations. In addition, we would be providing arms to criminal or terrorist elements that also wish us harm, and greater violence against our troops or people abroad would likely be carried out.

The U.S. State Department is much better suited to continue this role than the Commerce Department, which would seek profits for gun manufacturers anywhere and everywhere.

Please oppose this change and continue to carefully regulate any sale and export of guns and ammunition.

Thank you.

PUBLIC SUBMISSION

As of: 7/16/18 4:47 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-xn7a
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1312

Public Comment 1085. Individual. John J Paulhus. 7-4-18

Submitter Information

Name: John J Paulhus

General Comment

Foolish to change the regulation of firearms exports to Commerce. Don't do it.

PUBLIC SUBMISSION

As of: 7/16/18 4:48 PM
Received: July 04, 2018
Status: Posted
Posted: July 16, 2018
Tracking No. 1k2-942z-s9ns
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1313

Public Comment 1086. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

Our family (from Ohio) opposes the proposed rule change to transfer firearms export regulations from the State Department to the Commerce Department. This is unnecessary government fiddling, and dangerous for America. Being driven by business interests (including the NRA and those who profit from arms sales), there is no reason for doing this that would be in the interest of the US or our security -- both national and international. The Commerce Department is ill-equipped to handle arms exports, making the US vulnerable to traffickers, criminals, and terrorists, and poorly or unregulated arms exportation could also lead to instability elsewhere, eventually building negative backlash for our country. (We already see the mass-migration problems formed partly from some of our foreign policies which now we can learn from or anticipate -- this is such a case.) There is simply no reason to make this change (except for profit for a small cadre of people), and many, many reasons not to do so that (which benefit the entire country). In sum, this is reckless and unnecessary, and it would create cost to American taxpayers for infrastructure changes that would be profligate and irresponsible.

PUBLIC SUBMISSION

As of: 7/17/18 9:11 AM Received: July 04, 2018 Status: Posted Posted: July 17, 2018 Tracking No. 1k2-942z-e0uw Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1401

Public Comment 1087. Individual. Judy Landress. 7-4-18

Submitter Information

Name: Judy Landress

General Comment

I strongly Oppose a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place.

PUBLIC SUBMISSION

As of: 7/17/18 9:12 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-m92q
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1403

Public Comment 1088. Individual. Pete Sandifer. 7-4-18

Submitter Information

Name: Pete Sandifer

Address:

408 Pecan tree dr.

Montgomery, AL, 36109

Email: sparrowhawk5@charter.net

Phone: 3342729725

General Comment

Haven't we/ you seen enough school /work carnage? It's time to register all. Any with history of abuse or mental instability need not apply...

Of coerce having dishonorable discharged ex- Col. as leader of the NRA. Doesn't bode well for keeping criminals out of gun control.

Please make common sense Laws!

PUBLIC SUBMISSION

As of: 7/17/18 9:13 AM Received: July 04, 2018 Status: Posted Posted: July 17, 2018 Tracking No. 1k2-942z-hjmi Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1406

Public Comment 1089. Individual. Laurie Azzoto. 7-4-18

Submitter Information

Name: Laurie Azzoto

Address:

4212 Pisces Circle
Liverpool, NY, 13090

Email: azzoto@aol.com

Phone: 3159999999

Fax: 13090

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Guns don;t belong in the hands of just anyone.

PUBLIC SUBMISSION

As of: 7/17/18 9:13 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-j8os
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1407

Public Comment 1090. Individual. Carol Kussart. 7-4-18

Submitter Information

Name: Carol Kussart

Address:

12129 Angle Crossing Rd
Cerro Gordo, IL, 61818

Email: ckussart@gmail.com

Phone: 2178553258

General Comment

I oppose this rule change that would move the regulation of the export of firearms from the State Department to the Commerce Department. These weapons are military weapons and should remain that way. This move would eliminate the State Department's inspection program and public reporting. It would also remove licensing requirements for brokers which would very likely cause more trafficking, and it would remove the State Department's block on 3D printing of firearms. Congress would also have no oversight ability under this move. Therefore, the world would be less safe. I see this rule change as benefiting gun manufacturers only--there is no other benefit to this change. Keep the regulations where they belong--with the State Department.

PUBLIC SUBMISSION

As of: 7/17/18 9:18 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-u94l
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1413

Public Comment 1091. Individual. Dwan Dorman. 7-4-18

Submitter Information

Name: Dwan Dorman

General Comment

I oppose the rule change to switch regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department. This is dangerous on many levels.

PUBLIC SUBMISSION

As of: 7/17/18 9:19 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-6zw0
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1414

Public Comment 1092. Individual. Margaret Baum. 7-4-18

Submitter Information

Name: Margaret Baum

Address:

248 sunset dr
Wilmette, IL, 60091

General Comment

oppose the proposed rule change that would declassify firearms as military and move the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are weapons, no matter how much organizations may want to call guns sport accessories , and are used to kill people. Moving the regulation of firearms exports from the State Department to the Commerce Department would make firearms exports to dangerous and autocratic regimes easier, remove safeguards that help keep agents like organized crime and terrorist organizations from getting weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms and weapons exports need more controls and export licensing requirements, not less. Government should not sell out to dangerous business interests that work against public safety interests. I Oppose this proposal.

PUBLIC SUBMISSION

As of: 7/17/18 9:20 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-v6hh
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1416

Public Comment 1093. Individual. Grady Warren. 7-4-18

Submitter Information

Name: Grady Warren

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

PUBLIC SUBMISSION

As of: 7/17/18 9:21 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-se77
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1418

Public Comment 1094. Individual. Chris Kermiet. 7-4-18

Submitter Information

Name: Chris Kermiet

Address:

2267 Hudson St.
Denver, CO, 80207

General Comment

Moving the handling of export licenses of semiautomatic assault weapons and other firearms from the U.S. State Department (to the U.S. Commerce Department is a truly dumb idea. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

This appears to be a move by the gun manufacturers to sell more guns with less oversight. I'm strongly opposed to this.

PUBLIC SUBMISSION

As of: 7/17/18 9:21 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-942z-z075
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1420

Public Comment 1095. Individual. Julia Bumbaugh-Shah. 7-4-187

Submitter Information

Name: Julia Bumbaugh-Shah

Address:

1 S Lancaster Lane
Newtown, PA, 18940

General Comment

Right now, firearms exports are classified as military. These exports should stay under the regulation of the State Department, so that Congress can block sales of large batches of firearms to foreign countries with serious human rights concerns and be automatically informed about sizable weapons sales that it could stop in the name of national security.

The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

PUBLIC SUBMISSION

As of: 7/17/18 9:22 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-a7a4
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1422

Public Comment 1096. Individual. Katy Reddick. 7-4-18

Submitter Information

Name: Katy Reddick

Address:

50 Cherry Lane
Durham, CT, 06422

Email: katyganino@yahoo.com

General Comment

I oppose any change of regulations that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. These are military grade weapons and must be regulated as such.

PUBLIC SUBMISSION

As of: 7/17/18 9:23 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-k7nd
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1423

Public Comment 1097. Individual. Susan Kute. 7-4-18

Submitter Information

Name: Susan Kute

Address:

2338

Carolina Ave

Louisville, KY, 40205

Phone: 5025339487

General Comment

Keep control of shipments of firearms under control of State Department.

Please keep the strongest regulations on gun sales to all countries.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

PUBLIC SUBMISSION

As of: 7/17/18 9:24 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-vozt
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1424

Public Comment 1098. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I believe the State Department should retain regulatory control over the export of munitions. Shifting these munitions sales to Commerce Department oversight will result in these weapons getting into the hands of terrorists.

PUBLIC SUBMISSION

As of: 7/17/18 9:24 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-6c6o
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1425

Public Comment 1099. Individual. Stephen Weissman. 7-4-18

Submitter Information

Name: Stephen Weissman

Address:

434 Gorman Bridge Rd
Asheville, NC, 28806

Email: sweissman4@gmail.com

Phone: 828-255-5602

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Having such exports under the Commerce Department would remove many of the controls which limit massive firearms sales overseas. It would allow 3-D printers to export patterns for firearms.

PUBLIC SUBMISSION

As of: 7/17/18 9:25 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-xx73
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1426

Public Comment 1100. Individual. Debra whalen. 7-4-18

Submitter Information

Name: Debra whalen

General Comment

firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries

[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security. This would be a dangerous precedence. Do not change this law.

PUBLIC SUBMISSION

As of: 7/17/18 9:26 AM Received: July 04, 2018 Status: Posted Posted: July 17, 2018 Tracking No. 1k2-9430-f9yd Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1427

Public Comment 1101. Individual. Sharon Teagardin. 7-4-18

Submitter Information

Name: Sharon Teagardin

Address:

addieteagardin@mac.com

4

Indianapolis, 46227

Email: addieteagardin@mac.com

Phone: 3176963046

Fax: 46227

General Comment

The American people have made it clear that we are opposed to guns, particularly semi-automatics. Do your job and listen to the will of the people.

PUBLIC SUBMISSION

As of: 7/17/18 9:27 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-b92m
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1428

Public Comment 1102. Individual. Caren Flashner. 7-4-18

Submitter Information

Name: Caren Flashner

General Comment

I oppose the rule change that would switch the regulation of firearms export from the State Dept. to the Commerce Dept. I believe the State Dept. better protects the American people, whereas the Commerce Dept. wants to aid businesses in selling as many guns as possible, regardless of where and to whom.

PUBLIC SUBMISSION

As of: 7/17/18 9:27 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-yjkp
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1429

Public Comment 1103. Individual. Matthew Genaze. 7-4-18

Submitter Information

Name: Matthew Genaze

Address:

334 Harvard Street
Cambridge, MA, 02139

Email: aquarover@hotmail.com

General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Here are more details on how the rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Guns are an epidemic. Guns are a daily act of terrorism. Guns are a direct threat to our democracy. These facts require direct and significant action immediately. I am only able to support legislators and the parties they are members of that support aggressive gun regulation legislation.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

PUBLIC SUBMISSION

As of: 7/17/18 9:28 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-uzxu
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1430

Public Comment 1104. Individual. Susan Chandler. 7-4-18

Submitter Information

Name: Susan Chandler

Address:

3008 N 25th St
Fort Pierce, FL, 34946

General Comment

We already have endured many instances in which our firearms were used by foreign nationals to kill our troops. We have also witnessed our firearms being used by terrorists, drug traffickers and extremist regimes to take innocent lives.

Although they haven't done a stellar job of safeguarding our soldiers or civilian populations, the Department of State must maintain control of international firearms sales, and foreign firearms sales must remain classified as "military" ... the Department of Commerce has no resources to even begin to measure the monumental risks involved in weapons export.

No matter how many people support this change, it must not be made.

PUBLIC SUBMISSION

As of: 7/17/18 9:29 AM Received: July 04, 2018 Status: Posted Posted: July 17, 2018 Tracking No. 1k2-9430-ui2l Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1431

Public Comment 1105. Individual. Bunny Music. 7-4-18

Submitter Information

Name: Bunny Music

Address:

20B Clove Avenue

Sussex, NJ, 07461

Email: bunny.music@gmail.com

General Comment

Are you freaking kidding me? We don't have enough guns in this country? Get smart and at least ban assault weapons.

PUBLIC SUBMISSION

As of: 7/17/18 9:30 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-qu6l
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1432

Public Comment 1106. Individual. Erika Olson. 7-4-18

Submitter Information

Name: Erika Olson

Address: United States,

Email: eolson@mba2003.hbs.edu

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

I cannot believe this is even being considered. Guns and firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations.

If anything we need MORE oversight and controls, not less!

PUBLIC SUBMISSION

As of: 7/17/18 9:31 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-87tl
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1433

Public Comment 1107. Individual. Alisa Norquist. 7-4-18

Submitter Information

Name: Alisa Norquist

General Comment

Please do not move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

PUBLIC SUBMISSION

As of: 7/17/18 9:33 AM Received: July 04, 2018 Status: Posted Posted: July 17, 2018 Tracking No. 1k2-9430-jgrh Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1436

Public Comment 1108. Individual. Dustin Weinberger. 7-4-18

Submitter Information

Name: Dustin Weinberger

General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

If anything we need additional oversight and this change would drastically weaken oversight.

PUBLIC SUBMISSION

As of: 7/17/18 9:37 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-s7m2
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1439

Public Comment 1109. Individual. J Ebby. 7-4-18

Submitter Information

Name: J Ebby

General Comment

I write today to state my opposition to moving the regulation of firearms exports from the State Department to the Commerce Department.

Such change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and contributes to mass migration.

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The State Department has shown itself to be well equipped to perform this strategically important function. Together with Congress, it is in a unique position to thus protect this great nation from harm to national security that can result from large batch firearms sales to foreign countries.

There is nothing broken that could possibly be fixed by the moving the regulation of firearms exports from the State Department to the Commerce Department.

PUBLIC SUBMISSION

As of: 7/17/18 9:38 AM Received: July 04, 2018 Status: Posted Posted: July 17, 2018 Tracking No. 1k2-9430-k7lx Comments Due: July 09, 2018 Submission Type: Web
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Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1441

Public Comment 1110. Anonymous. 7-4-18

Submitter Information

Name: Anonymous Anonymous

General Comment

I oppose this!

PUBLIC SUBMISSION

As of: 7/17/18 9:38 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-9y6w
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1442

Public Comment 1111. Individual. Raymond Valinoti, Jr.. 7-4-18

Submitter Information

Name: Raymond Valinoti, Jr.

General Comment

I received this disturbing message from MomsRising.org in my email. I agree with this organization about this:

"The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business)...] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

"HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries...] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

"Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

"The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration."

PLEASE, for the sake of America and the rest of the world, OPPOSE this rule change!

PUBLIC SUBMISSION

As of: 7/17/18 9:39 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-k5q6
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1443

Public Comment 1112. Individual. Linda Novenski. 7-4-18

Submitter Information

Name: Linda Novenski

General Comment

I am strongly opposed to the unbridled commercialization of weapons sales. Our national security must not be bypassed by weapons manufacturers and arms dealers intent on boosting their sales wherever they can find buyers. It is bad enough right now, but removing the last vestige of US Dept of State control means uncontrolled flows of military weapons to the highest bidder.

Profits are not the only factor to consider here. Our national security, and security of our citizens around the world, are at stake. Keep international traffic in arms under the control of the U.S. Department of State.

Sincerely,
Linda Novenski

PUBLIC SUBMISSION

As of: 7/17/18 9:40 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-a59f
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1444

Public Comment 1113. Individual. Mike Sudalnik. 7-4-18

Submitter Information

Name: Mike Sudalnik

Address:

7810 E. Lamont Rd.
Argyle, WI, 53504

Email: mikensue@wildblue.net

Phone: 6085433729

General Comment

This RULE would DESTROY any control of arms sales by Agencies(Congress,State Department,etc.) and hand off this responsibility to an agency(Commerce), that has MEAGER ABILITY, INSUFFICIENT PERSONNEL , and a mind set 180 degrees in opposition to NATIONAL SAFETY! "IF they have the cash..they get the guns.." this would be their maxim..a formula any GANGSTER, revolutionary, terrorist, etc. would love! Totally UNACCEPTABLE!

PUBLIC SUBMISSION

As of: 7/17/18 9:41 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-gc6p
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1445

Public Comment 1114. Individual. Laura Carroll. 7-4-18

Submitter Information

Name: Laura Carroll

Address:

9511 Saginaw st
Silver spring, MD, 20901

Email: Tomc61@verizon.net

Phone: 301-589-3359

General Comment

Please do not make this change! We need more oversight
Of gun trafficking not less. Do we really want to unleash
3D printed guns in the world? Do we really want to allow
Guns to be sold to oppressive governments? Sounds like
Oliver North learned nothing from his Iran contra days.
Look our president has continually expressed sympathy
And alignment its brutal dictators: kim jung un, Duarte,
And Putin to name a few. This is not what Americans
Want to be known for. We stand for freedom. Please do
Not take this action.

PUBLIC SUBMISSION

As of: 7/17/18 9:41 AM
Received: July 04, 2018
Status: Posted
Posted: July 17, 2018
Tracking No. 1k2-9430-vzju
Comments Due: July 09, 2018
Submission Type: Web

Docket: BIS-2017-0004

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Comment On: BIS-2017-0004-0001

Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant
Control Under the United States Munitions List (USML)

Document: BIS-2017-0004-1446

Public Comment 1115. Individual. q q. 7-4-18

Submitter Information

Name: q q

General Comment

close the loopholes, make background checks obligatory, control the distribution, ban bump stocks